

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. ) 3:17-CR-00169-B  
 )  
SAID AZZAM MOHAMAD RAHIM, )  
 )  
Defendant. )

PARTIAL TRANSCRIPT OF PROCEEDINGS  
TESTIMONY OF LORENZO VIDINO, Ph.D.  
BEFORE THE HONORABLE JANE J. BOYLE  
UNITED STATES DISTRICT JUDGE  
MAY 1, 2019

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FEDERAL COURT REPORTER - 214.753.2747

TRANSCRIPT OF PROCEEDINGS

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1                                   **LORENZO VIDINO, Ph.D.**

2   **having been first duly sworn, testified as follows:**

3                                   **DIRECT EXAMINATION**

4   **BY MS. MEEKS:**

5   Q.    Dr. Vidino, thank you for being here this  
6   morning. Can you tell us what your current  
7   employment is?

8   A.    I'm the director of the program in extremism at  
9   the George Washington University.

10   Q.   And what is the role of the program on  
11   extremism at George Washington?

12   A.   What the program does is basically research on  
13   everything extremism with a particular focus on  
14   jihadist groups, Al-Qaeda, ISIS, in the west, in the  
15   United States in particular. So it's a team of  
16   around 12, 15 people. And what we do is basically a  
17   lot of analysis, and then we publish most of our  
18   work. And that's for dissemination to the wider  
19   public, the policymakers, law enforcement and the  
20   wider public.

21   Q.   And does the program have any specialized  
22   particular terrorist group that it follows?

23   A.    ISIS and Al-Qaeda.

24   Q.   Is the program, part of its research, does it  
25   monitor online activities for propaganda with regard

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1 to those groups?

2 A. Yes. That is a big part of what we do. We  
3 have a small team devoted to monitoring certain  
4 platforms where ISIS supporters are active, some of  
5 the larger ones like FaceBook or Twitter, or some of  
6 the smaller ones. And we have published a lot of  
7 reports on that. We constantly monitor those  
8 platforms.

9 Q. Okay. And besides that, what else is your  
10 professional background?

11 A. I have a law degree. And then I have a  
12 master's and a doctorate from the Fletcher School of  
13 Law and Diplomacy in International Security, we  
14 focus on the Middle East. So I have basically been  
15 an academic for the last 19 years.

16 Q. And has that focus been on -- you said the  
17 Middle East?

18 A. Mostly jihadist activities in the West; so  
19 Middle East. But how groups like Al-Qaeda and ISIS  
20 function, but especially in the West, how they  
21 recruit people, how people in the West mobilize and  
22 support and join those groups.

23 Q. Would you say that you are very familiar, then,  
24 with ISIS and how it functions?

25 A. I would say so, yes.

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1 Q. And are you aware of trends in terrorism?

2 A. Yes, of course. We look at things -- I look at  
3 things globally to understand the dynamics here in  
4 the United States or European countries. So  
5 understanding general trends with terrorist groups  
6 and the geopolitics behind it is crucial.

7 Q. Okay. You talked a little bit about being  
8 published. Can you explain that further? What does  
9 that mean? What types of things have you published,  
10 and is it subject to peer review?

11 A. Yes. So basically I have published some six  
12 books and around 20 journal articles and around 20,  
13 25 reports and around probably a couple of hundred  
14 shorter articles. The bigger products are generally  
15 peer reviewed. Peer reviewed means that at least  
16 two scholars -- or it could be analysts from  
17 government agencies -- look at what I write, what my  
18 center publishes, and we get feedback.

19 For example, in academic journals, if you don't  
20 pass the peer review, you're not going to get  
21 published. So there are ways to keep, of course,  
22 the academic rigor of what we publish. And even for  
23 the things we publish internally, that means not in  
24 journals, we do sort of a voluntary peer review.  
25 That means before publishing a report, we send it

1 out to colleagues to get their feedback and to  
2 basically see their comments, if they have suggested  
3 edits.

4 Q. Give us a sampling or idea of a sampling of the  
5 types of topics that you publish on?

6 A. Sure. Well, we publish a lot on -- the first  
7 big report that we did as a center, I was one of the  
8 two authors. And keep in mind, as the director of  
9 the center, everything sort of goes to me, even the  
10 things written by the analysts of the center, I have  
11 to read it and edit. Some of it, of course, I write  
12 myself. It was on ISIS in America. It was  
13 basically the first academic report that looked at  
14 how, at the time, around only 80, 90 individuals  
15 throughout the United States had been charged for  
16 ISIS-related activities.

17 We have done a lot of work on the online  
18 component of immobilization. So looking at how the  
19 ISIS sympathizing community online functions, how  
20 these individuals communicate, what platforms were  
21 used and so on and so forth.

22 We are currently looking at financing, how  
23 individuals for ISIS supporters in the United States  
24 fund their activities, whether they send money  
25 abroad, whether they receive money from abroad.

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1           We do a lot of work in trying to understand who  
2       these individuals are, what the -- the reasons that  
3       lead them to radicalize. That's sort of a term of  
4       art. That means embracing ISIS' worldview, and  
5       then, eventually, carry out the attacks on ISIS'  
6       behalf or travel or attempt to travel to the city of  
7       Iraq to join ISIS.

8       Q.    Okay. And have any particular government  
9       agencies or organizations used those reports or  
10      relied on them in some fashion?

11      A.    Yes. We are an independent entity. Of course  
12      we are part of major university. But we -- we make  
13      it a point to have our reports being very accessible  
14      and useful for different agencies, different  
15      stakeholders.

16           We regularly provide briefings to Congress. I  
17      have testified before Congress several times. Our  
18      reports have been the foundation of at least two  
19      hearings that I know of before Congress. I'm aware  
20      that some of the reports we publish are being used  
21      as training materials by different law enforcement  
22      agencies at the federal, state and local level  
23      throughout the country.

24           Same goes in certain -- in other foreign  
25      countries where I know our materials are used.

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1 Q. Yes. So what is the international reach of  
2 your program, and have you had the opportunity to  
3 also speak or participate in international forums?

4 A. Yeah. Of course the main focus of the center  
5 is what happens in the United States, but obviously  
6 one has to contextualize it in the broader dynamics  
7 taking place in Europe, the Middle East and other  
8 parts of the world.

9 Also my background -- I think everybody might  
10 have picked up on the accent -- I am originally from  
11 Italy. I do a lot of work in Europe. We do work  
12 with several governments and research centers,  
13 universities, media outlets, many European and  
14 Middle Eastern countries.

15 I travel very often. I attend conferences.  
16 Just the last three months I have been in the Middle  
17 East twice. I have spoken at major conferences in  
18 Singapore and Italy and Spain. So traveling is a  
19 big part of what we do, because of course one has to  
20 sort of understand trends in other countries, so  
21 their global phenomenon. And only by exchanging  
22 thoughts and notes with people in other countries  
23 one can make sense of it.

24 Q. Okay. Have you testified in other terrorism  
25 trials?



1 A. Yes, I have.

2 Q. And you mentioned that you are originally from  
3 Italy; is that correct?

4 A. Yes.

5 Q. So are you familiar with a co-conspirator in  
6 this case by the name of Mouner Al Aoual?

7 A. I am.

8 Q. Did you have any investigation or any  
9 involvement in the investigation of that case?

10 A. No, I have not.

11 THE COURT: What was his name?

12 MS. MEEKS: It's Mouner Al Aoual, Your  
13 Honor.

14 THE COURT: Okay.

15 Q. (By Ms. Meeks) So it's just a coincidence that  
16 you happen to be from Italy?

17 A. Very much so.

18 Q. What languages do you speak?

19 A. Italian and English, and I get by French  
20 Spanish and German.

21 Q. Do you speak Arabic?

22 A. I don't.

23 Q. Are you familiar with certain Arabic terms in  
24 the context of the jihadist community?

25 A. Very much so, with sort of the terms of art and

1 having studied this phenomenon for almost 20 years,  
2 it's inevitable you come across them all the time.

3 Q. Let's talk a little bit about your CV or your  
4 resume, which is Government's Exhibit 51.

5 THE COURT: 51 is not in evidence. 51 is  
6 not in evidence I don't think.

7 MS. MARTIN: No, it's not.

8 MS. MEEKS: Okay.

9 Q. (By Ms. Martin) So we're going to show up on  
10 the screen what is marked as Government's Exhibit  
11 51.

12 THE COURT: You can't show it because it's  
13 not --

14 MS. MEEKS: I'm sorry, Your Honor.

15 THE COURT: It doesn't really matter. His  
16 CV really isn't admissible. Can you just pull from  
17 it?

18 MS. MEEKS: I wanted him to walk us  
19 through his CV if it reflected his employment  
20 history. We would move to admit it into evidence  
21 subject to objection.

22 THE COURT: Any objection?

23 MR. WHALEN: Your Honor, I don't think  
24 it's relevant.

25 THE COURT: I don't think so, either. You

1 can use it to refresh his recollection, but it's not  
2 admissible.

3 MS. MEEKS: Okay. Then we will move on  
4 from that.

5 Q. (By Ms. Meeks) You've provided the government  
6 a copy of your CV or your resume?

7 A. Yes, I did.

8 Q. And have you been paid for your time spent  
9 reviewing the evidence and this information, have  
10 you been paid or will you be paid in this case?

11 A. I will be, yes.

12 Q. Okay. And is that standard practice for people  
13 in your area?

14 A. Yes.

15 Q. Does that have any effect on your testimony  
16 here today?

17 A. No, it doesn't.

18 MS. MEEKS: At this time, Your Honor, I  
19 would move to have Dr. Vidino recognized as an  
20 expert witness.

21 THE COURT: Any objection?

22 MR. WHALEN: No, Your Honor.

23 THE COURT: I recognize him as an expert.  
24 Go ahead.

25 MS. MEEKS: Thank you, Your Honor.

1 Q. (By Ms. Meeks) Okay. We were talking about  
2 ISIS. But does ISIS have other names that it goes  
3 by or is known as?

4 A. ISIS does go under several names that reflects  
5 the long history the group has had. But people call  
6 it ISIS, ISIL, Daesh, Dawla, several names that  
7 people can use to refer to the same group.

8 Q. Okay. And has that been designated as a  
9 foreign terrorist organization by the U.S.  
10 Department of state?

11 A. Yes, it has.

12 MS. MEEKS: Your Honor, at this time I  
13 request to publish Government's Exhibit 53, which  
14 has been admitted into evidence.

15 THE COURT: That's fine.

16 MS. MEEKS: Can we get Government's  
17 Exhibit 53, please?

18 Q. (By Ms. Meeks) Do you recognize this,  
19 Dr. Vidino?

20 A. I do. That is the State Department designation  
21 of what is the original group, the original name  
22 used by ISIS, or at least that's the very first  
23 designation of the group.

24 Q. So there appear to be several names contained  
25 in this document. Is that accurate?

1 A. Yes. And since then, actually, several other  
2 names have been added; again, to reflect the history  
3 of the group, the expansion and evolution of the  
4 group.

5 Q. Okay. Let's talk a little bit about that. How  
6 did it -- that's fine, thank you.

7 How did it evolve over time of as sort of a  
8 traditional Al-Qaeda model?

9 A. It's a very long and complex history. I will  
10 try to keep it short. I think one can trace the  
11 origins of the group to a man named Abu Musab  
12 al-Zarqawi.

13 THE COURT REPORTER: Will you spell that,  
14 please?

15 THE WITNESS: Yeah. A-B-U, M-U-S-A-B,  
16 A-L, Z-A-R-Q-A-W-I, and of course there are  
17 variations to that as well.

18 A. Zarqawi was a fairly charismatic and prominent  
19 Jordanian jihadist, was based in Afghanistan, close  
20 to Osama bin Laden, close to Al-Qaeda in the late  
21 '90s. He led a small group after the U.S. invasion  
22 of Afghanistan right after 911 and relocated to  
23 Iraq.

24 When, in 2003, the U.S. invaded Iraq, that  
25 group found itself in a very convenient situation

1 from a jihadist point of view, from Al-Qaeda's point  
2 of view, meaning that it was right there where U.S.  
3 forces were operating. So it became a very  
4 prominent group, and it led the insurgency against  
5 the U.S. military.

6 By 2004, it was officially named as Al-Qaeda in  
7 Iraq. That is when the designation is first from.  
8 It went through different iterations, different  
9 names, just sticking to the main ones. In 2006, it  
10 renamed itself as Islamic State of Iraq. This sort  
11 of reflects the ambition that the group has always  
12 had to create a state, to create a society, an  
13 independent state ruled by a very strict  
14 interpretation of Islamic law.

15 Of course it wasn't very successful at the  
16 beginning. The group was active in Iraq, led  
17 insurgency, carried out countless terrorist attacks  
18 in Iraq in those years.

19 It went through decline from, let's say, by  
20 2010 and 2011 and then sort of a renaissance or  
21 resurgence in 2011, 2012 with the beginning of the  
22 civil war in Syria. Syria is a neighboring country  
23 to Iraq, and it was engulfed in civil war, which  
24 still plagues the country right now.

25 What Al-Qaeda -- or the Islamic State in Iraq

1 did in 2012, it started operating across the  
2 border -- at least part of it across the border and  
3 started operating in Iraq, as well -- in Syria, as  
4 well; hence the name ISIL or ISIS, to reflect  
5 Islamic State of Iraq and the Levant or Islamic  
6 State of Iraq and Sham, which is the Arabic term for  
7 the region of the Levant, which is Syria.

8 Q. Yeah, I was going to ask you the next question  
9 about the Levant. Can you describe what that means  
10 geographically?

11 A. That's historical region which encompasses  
12 Syria, Lebanon, part of Palestine, Israel and parts  
13 of Jordan.

14 Q. So that's what's reflected now in the current  
15 terminology of ISIS and ISIL.

16 A. ISIS and ISIL, yes. So when the group moved  
17 from Iraq or it expanded from Iraq also to Syria, it  
18 added the "S" or "L," the Sham or Levant part to the  
19 name, hence ISIS or ISIL. So the group became very  
20 active in the Syrian conflict, again employing the  
21 same tactics of -- a mix of military and terrorist  
22 tactics. They are brutal, they are ruthless, they  
23 are efficient, if you will.

24 By 2014, it had occupied a fairly large portion  
25 of territory in both Syria and Iraq, territory which

1 is the size of France, so fairly, fairly large. But  
2 it's taken advantage of the chaos that engulfed both  
3 Syria and Iraq.

4 And what it did in June of 2014, it declared  
5 the territory to be a Caliphate. That means  
6 declared it to be an Islamic State, and it ran that  
7 territory until basically less than a year ago as a  
8 de facto state with functioning of administration,  
9 with a hierarchy, with de facto ministries, the  
10 department of sanitation, you name it. It was  
11 really a fairly efficient bureaucracy and of course  
12 a fairly ruthless one, very, very violent and very  
13 strict in how it enforced its vision on its  
14 territory.

15 Q. Okay. Let's backtrack just a little bit. You  
16 had talked about the Caliphate. What does that mean  
17 historically? What is a Caliph?

18 A. Caliphate is the entity that traditionally has  
19 ruled. And in the Muslim world, when the Caliph is  
20 the leader of the Muslim community, of the global  
21 Muslim community, and it embodies both political and  
22 religious power.

23 Now, the last universal-recognized Caliph  
24 basically was removed in the 1920s. What ISIS did,  
25 it tried to reclaim that Caliph, Baghdadi, who is



1 the leader of ISIS, claimed to be the new Caliph,  
2 which of course a claim that the vast majority of  
3 Muslims worldwide rejected, but it's how ISIS tried  
4 to claim legitimacy and tried to claim its global  
5 appeal.

6 Q. And that person's name was -- can you repeat it  
7 one more time?

8 A. Abu Bakr al-Baghdadi, who is the leader of ISIS  
9 and self-appointed Caliph.

10 THE WITNESS: Do you need the spelling.

11 THE COURT REPORTER: Please.

12 THE WITNESS: Abu is A-B-U. Bakr,  
13 B-A-K-R, al and then B-A-G-H-D-A-D-I.

14 Q. (By Ms. Meeks) And who are some of the other  
15 important members or leaders in ISIS?

16 A. The number 2 is Abu Mohammed al-'Adnani,  
17 A-D-N-A-N-I. He was killed in 2016, but he was in  
18 charge of external operations for ISIS, that means  
19 basically planning terrorist attacks worldwide. And  
20 he was also the main spokesperson for ISIS.  
21 Baghdadi has not historically been a very  
22 media-friendly leader while 'Adnani has given a lot  
23 of public speeches.

24 Q. How about an individual named Shishani?

25 A. Shishani was a -- is a Chechen leader, is a

1 name I would say of ISIS. He climbed up through the  
2 ranks of ISIS because he was a very good field  
3 commander, not originally from Syria or Iraq. So  
4 one of the leaders of the foreign factors were  
5 fighting with ISIS, but because of his skills, he  
6 managed to become a member of the upper echelons of  
7 ISIS.

8 Q. We mentioned a little bit about the ways that  
9 ISIS became a functioning state. Can you give us  
10 more detail into what types of ways that it would  
11 operate in -- in operating like a state?

12 A. As I said, it really had, you know, the same  
13 sort of a structure that mirrored that of states,  
14 like the states are recognized by the United  
15 Nations, with head of state, with ministries, and so  
16 on and so forth.

17 Now, of course all of that was based on a very  
18 extreme fringe-literalist interpretation of Islam,  
19 and that entailed, therefore, a very brutal, very  
20 literalist interpretation of certain rules. So  
21 punishments for behaviors were not considered to be  
22 in line with the law, were extreme, from chopping  
23 people's heads off, amputations, very, very severe  
24 punishments for anybody that was not in line,  
25 whether -- because if a person was perceived to be a

1 spy or in any way speaking ill against the group or  
2 because they were engaging in moral behaviors that  
3 were not considered to be acceptable by ISIS. So  
4 violence was a crucial component of how ISIS kept  
5 order within its society. So there's no dissent  
6 allowed, let's put it like that.

7 The idea that ISIS also always had --

8 MR. WHALEN: Objection to the narrative,  
9 Your Honor.

10 THE COURT: Sustained. Ask another  
11 question.

12 MS. MEEKS: Yes, Your Honor.

13 Q. (By Ms. Meeks) In terms of the law that  
14 governed the state, can you tell us a little bit  
15 about that?

16 A. So ISIS has -- so there's Islamic law in  
17 general, which is called Shari'a. Of course there's  
18 not a universally accepted and codified body of  
19 Islamic law. There are different opinions from  
20 different jurisprudence. ISIS adopts its own  
21 interpretation of Shari'a, of Islamic law, which is  
22 extreme literalist, which I think it's fair to say  
23 is quite extreme.

24 Q. Does that include sort of the punishments that  
25 you were also speaking about?

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1 A. Yes, very physical and brutal punishments which  
2 ISIS meted out in public.

3 THE COURT: Do you know if you have a  
4 witness in here? Is it okay? I mean everybody  
5 agree with that?

6 MS. MARTIN: Your Honor, I believe she was  
7 excused.

8 MR. WHALEN: She was, Your Honor.

9 THE COURT: Go ahead.

10 MS. MEEKS: Thank you, Your Honor.

11 Q. (By Ms. Meeks) Okay. So there are other  
12 political aspects at play. Can you talk about the  
13 difference between Sunni and Shiite and give us an  
14 understanding of that.

15 A. It's a very complex issue. But I would say in  
16 a nutshell, Sunni and Shiite are the two main sects  
17 in Islam. It's a split. It dates back to the very  
18 early days of Islam. It has to do with the  
19 leadership within the Muslim community. And of  
20 course, then, some issues having to do with  
21 doctrine, simplifying things a lot, I would say sort  
22 of like Catholic and Protestants, but of course it's  
23 very different. And obviously when it comes to the  
24 most extreme parts of those communities, there's  
25 very strong animosity between Sunnies and Shias, and

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1 groups like ISIS would not see groups as Shias as  
2 Muslims.

3 Q. Let's talk about some of the terminology that  
4 you would be familiar with or that you would come to  
5 encounter in your studies.

6 Are you familiar with the term "mobilize"?

7 A. Yeah. Mobilize is normally the term that is  
8 used both in jihadist community and, say, by people  
9 in sort of more in the academic community, to mean  
10 when people decide to get into action, do something;  
11 when people have embraced ISIS worldview and mindset  
12 and then take it to the next level, which is doing  
13 something. Generally mobilizing entails either  
14 traveling to join a group or carrying out an attack  
15 wherever they are.

16 Q. Is that similar to the term "Hijrah"?

17 A. Hijrah is travel. Hijrah is only travel. So,  
18 again, like with a lot of things with groups like  
19 ISIS and al-Qaeda do, they take terms which are  
20 mainstream terms in Islamic theology, but use them  
21 in a certain interpretation.

22 Hijrah is what mainstream Islam, the prophet  
23 Mohammed did when he traveled from Mecca to Medina  
24 to create the first Muslim community.

25 Jihadists use it to basically represent the

1 travel that people should do to join groups like  
2 ISIS and al-Qaeda, so leave places where Islam is  
3 not established, like the United States or pretty  
4 much any place on the planet, and join what they  
5 believe to be true Muslim groups, like ISIS and  
6 al-Qaeda.

7 Q. And what about jihad, you mentioned that. Can  
8 you explain it? Are there different kinds of jihad?

9 A. Again, jihad is a term that has a meaning  
10 within mainstream Islam which means basically to  
11 strive for God, to do something difficult to please  
12 God.

13 Jihadists would use most of the narrow  
14 interpretation of jihad, which is fighting, doing  
15 something difficult, but is military fighting to  
16 please God.

17 Q. Does it have other meanings? Can it mean other  
18 things such as other types of jihad, Jihad of the  
19 Pen? Is that something?

20 A. Yeah. Jihadists would say, of course, there's  
21 different ways that you can fight for God. One is  
22 military fighting, but there's Jihad of the Pen,  
23 which is basically writing or spreading information  
24 and awareness about jihadist groups and what their  
25 activities are, basically recruiting.

1 Q. What is the type of jihad that's promoted by  
2 ISIS?

3 A. ISIS does both, promotes both, everything that  
4 is useful to the cause. So ISIS is engaged in  
5 military fighting, but is at the same time directly  
6 engaged and also actively supporting people who  
7 spread their message. Propaganda goes hand in hand  
8 with fighting. You can't have one without the  
9 other.

10 Q. What do the words polytheism and monotheism,  
11 what does that mean to you?

12 A. So Islam, like Christianity, like Judaism, is a  
13 monotheist religion. But monotheism for groups like  
14 ISIS and al-Qaeda takes a very strong meaning,  
15 meaning that only Muslims -- only Muslims will  
16 accept the very extremist interpretation of Islam.  
17 They accept the real monotheist; everybody else is  
18 polytheist, and of course adores more than one God.  
19 And being polytheist, of course, is a major sin  
20 punishable by death.

21 Q. And is polytheism in this context, is it  
22 applied to other aspects of importance to a  
23 community? For polytheism is it only -- is it  
24 multiple gods, or would it also encompass something  
25 like democracy?

1 A. Yeah, of course the -- the broader  
2 interpretation the jihadist groups adopt, it's not  
3 just being openly worshiping server of gods, like  
4 Hindus would do. But it's also putting anything at  
5 the same level of God. So if you believe in  
6 democracy, you are polytheist, because groups like  
7 ISIS would believe that only Shari'a, which is  
8 God-mandated, is the true law. Manmade law, like  
9 the ones in democracy, basically means man  
10 substituting himself to God. That is, of course, a  
11 major sin, so you are not a real monotheist, you're  
12 not a true Muslim.

13 Q. Talk a little bit about traveling, hijrah and  
14 mobilize. Why is it important to ISIS for people to  
15 mobilize or to commit hijrah to the Islamic State?

16 A. ISIS has always sought recruits. A lot of -- a  
17 big part of the membership of ISIS, of course, are  
18 made of people who are in Syria and Iraq, which is  
19 the central territory that ISIS controls. But ISIS  
20 has always welcomed and encouraged the migration of  
21 people from other countries. According to the  
22 United Nations, some 60,000 people physically joined  
23 ISIS in Syria and Iraq. And so they left their  
24 countries in Europe, the Middle East, Southeast  
25 Asia, and traveled and joined ISIS. And they have



1 played a big role in ISIS development.

2 Q. Is it just men who would travel?

3 A. No. It's mostly men, but there's a fairly  
4 large part of women who have also traveled and  
5 joined the group.

6 Q. Would families travel?

7 A. That's also a very common dynamic, which ISIS  
8 highly encouraged. I mean, ISIS, as we said  
9 earlier, has created this narrative, they were  
10 building a state, a perfect utopian society. So it  
11 wasn't just men fighting, as much as it was, of  
12 course, very important. It was bringing families,  
13 women, children, to create the perfect society they  
14 wanted to create.

15 Q. Are you familiar with the term "ISIS bride"?

16 A. Yes.

17 Q. What does that mean to you?

18 A. It's a term that is sometimes used to define  
19 women who travel and join ISIS and want to marry  
20 somebody in ISIS.

21 Q. And what about for younger women, for young  
22 girls or teenagers?

23 A. It's also a fairly normal dynamic with some  
24 cases of very, very young girls traveling generally  
25 with their parents or with their husbands. But we

1 have seen cases of 12, 13-year-old girls traveling,  
2 sometimes alone, even from European countries, and  
3 joining ISIS.

4 Q. When people would go, at the height of its  
5 control, what territory did it hold and for how long  
6 and how has that changed over time?

7 A. Yeah. Well, as we said earlier, 2014 and early  
8 2015 was sort of the height of ISIS territorial  
9 control. It controlled basically parts of Syria and  
10 parts of Iraq, as we said earlier, the size of  
11 France, give or take, although large parts of it  
12 were desert.

13 By the end of 2014, the U.S.-led international  
14 coalition started attacking ISIS, the military.  
15 That means also through local allies on the ground.  
16 So ISIS started being under attack and started  
17 progressively losing part of its territory.

18 By 2017, it really had lost a significant  
19 amount of it. It had lost some of the major cities  
20 it held. Basically at this point, it's literally a  
21 matter of couple of months ago, it lost the last  
22 stronghold that it held in Syria, which is a small  
23 town of Baghouz, B-A-G-H-O-U-Z. So basically at  
24 this point ISIS no longer controls territory in  
25 Syria and Iraq.

1 Q. At the height of its control over a territory,  
2 was it calling for people to travel to -- or really  
3 even while it was building the territory, people to  
4 travel to the land?

5 A. That has always been one of the strongest  
6 messages from the beginning; travel, come to fight  
7 or come to help build a state.

8 Q. What were the different ways that people would  
9 travel? Would they have direct communications,  
10 indirect communications?

11 A. It depends. There's different patterns for  
12 different dynamics for different individuals. I  
13 would -- I would sometimes use sort of an analogy.  
14 It's like traveling when you fly, it's like first  
15 class, business class, economy class. And I would  
16 say first class basically happens with those very  
17 few individuals who have very strong connections to  
18 ISIS. People who travel there, because of course  
19 the difficulty of course is not so much in traveling  
20 to the Turkish border, which is sort of the gateway  
21 to get to Syria and Iraq, but in how you connect  
22 with the group, how do you actually show up and join  
23 the group.

24 So first class would be those individuals that  
25 go there and have a strong predating connection with

1 the group of people who have been fighting in  
2 previous conflicts; they are part of that  
3 environment.

4 Business class would be those that manage to  
5 establish some kind of connection mostly through  
6 social media and had a way to connect with the  
7 group. So the path would be, for example, somebody  
8 wanting to travel from the West to Syria would first  
9 fly to Turkey, and in Turkey would meet with  
10 somebody with whom he or she had contact through  
11 social media, had a phone number, a name, a place,  
12 and some kind of way to get in touch with the group.

13 Economy class is really people who, especially  
14 at the beginning of the conflict, just traveled to  
15 the border between Turkey and Syria and tried their  
16 luck to make their way into Syria. And particularly  
17 at the very beginning of the mobilization, I would  
18 say the majority of people were traveling economy  
19 class, meaning just showed up at the border. And  
20 ISIS was really very different from a lot of other  
21 groups in the sense it was very welcoming, very  
22 open. Anybody that -- there was some vetting, of  
23 course, just wanted to sort of make sure people were  
24 not infiltrating the group, people were not spying  
25 on the group. But compared to other groups, like

1 al-Qaeda, ISIS has always been very open. The bar  
2 for joining the group has always been fairly low.

3 Q. Okay. And what about -- what about ISIS  
4 wanting attacks in infidel countries? Can you  
5 explain that?

6 A. Yeah. Well, ISIS, as always, encouraged  
7 attacks against the West, but that message has  
8 become particularly strong after September 2014.

9 September 2014 is where, as we said earlier,  
10 the U.S.-led international coalition started bombing  
11 and attacking ISIS. Their reaction from ISIS was of  
12 course military on the ground, but was also calling  
13 for attacks, mobilizing its global network of  
14 supporters to carry out attacks in the countries  
15 that were attacking ISIS. The message was, they  
16 attack us here, we attack them back home.

17 Q. What is the reasoning for that?

18 A. The reasoning for that is there's different  
19 strategic purposes in doing that on ISIS part. One  
20 is, of course, weakening the willingness, the will  
21 of individual countries in being part of the  
22 anti-ISIS coalition. They estimated that if we  
23 attack, let's say, Spain, with terrorist attacks on  
24 Spanish ground, Spanish people will basically -- and  
25 the Spanish government will then pull out of the

1 coalition, the coalition will be weak, and that's  
2 obviously good for ISIS.

3 You can argue there's a very strong second  
4 strategic objective, which is the idea of  
5 polarizing, creating polarization in western  
6 societies; the idea of creating a divide between  
7 Muslims and the non-Muslims; the idea of creating a  
8 perception of mainstream society that all Muslims  
9 want to carry out attacks, which creates  
10 depolarization in society which serves ultimately  
11 ISIS purpose.

12 Finally I would say it's just a simple point of  
13 revenge. You attack us here, you kill us here, we  
14 kill you back there. It's provincial what you are  
15 doing. So all this -- this -- the series of attacks  
16 we have seen in the West over the last five years,  
17 basically, respond to these three dynamics.

18 Q. How many attacks have we seen in the last --  
19 over the existence of ISIS?

20 THE COURT: Please ask the question again.

21 Q. (By Ms. Meeks) How many attacks has the West  
22 experienced pursuant to ISIS?

23 A. Since the declaration of the Caliphate, since  
24 June 29, 2014, 80, 81, depends on what you count as  
25 ISIS attacks, but around 80.

1 Q. Would you still consider ISIS to be a threat to  
2 the West?

3 A. Yes, very much so.

4 Q. Why is that?

5 A. Because ISIS still exists. It has lost its  
6 territory in Syria and Iraq, but the group is still  
7 there. We have seen calls. We have seen leadership  
8 of the group emerging even in the last few days. We  
9 know that they have networks in western countries.  
10 We see occasionally terrorist attacks in the West,  
11 although less than a few years ago. We see on a  
12 weekly basis arrests by law enforcement intelligence  
13 agencies in all western countries.

14 The assessment, public assessments by law  
15 enforcement intelligence agencies in all western  
16 countries are basically the same, but ISIS is still  
17 very much around.

18 Q. Okay. Let's talk a little bit now about media  
19 and the role it plays.

20 Does ISIS use traditional or nontraditional  
21 forms of media or both?

22 A. It uses both. But where ISIS has really put a  
23 lot of effort and has got a lot of good results from  
24 their point of view is the internet and social media  
25 in particular.

1 Q. Let's talk first about the traditional media.  
2 Are there traditional media aspects to the terrorist  
3 organization?

4 A. Yes. They publish sort of magazines, and of  
5 course some of them were distributed when ISIS was  
6 controlling territory, it distributed them in  
7 printed form among its population. But all those  
8 materials are also published online, so you can find  
9 the magazines also online.

10 Q. What were the magazines called?

11 A. There's plenty. I would say the two main ones  
12 are called Dabiq, D-A-B-I-Q, and Roumiya,  
13 R-O-U-M-I-Y-A.

14 Q. What kind of content would you find in those?

15 A. The quintessential propaganda material;  
16 information about the group, about its operations;  
17 whether on the ground in Iraq or globally, of course  
18 from their point of view; pieces that are more, I  
19 would say, ideological/theological. That means  
20 inciting people to join the group, encouraging them  
21 to do so, encouraging people to carry out attacks.

22 A lot of it, of course, is framed to the lenses  
23 of religion. That's how ISIS sort of does. It uses  
24 the mental of -- of religion to frame all its  
25 discourse, its narrative. So it's informational,



1 but obviously with that propaganda aspect, which is  
2 crucial.

3 Q. What do you see on social media?

4 A. So ISIS has always been, from the very  
5 beginning, very good at using social media,  
6 disseminating its propaganda. And I think it's fair  
7 to say from both a quantitative and qualitative  
8 point of view. ISIS propaganda has been,  
9 comparatively speaking, very high, very high  
10 quality. We're talking about, you know, videos that  
11 really look like some of the best video games one  
12 would see or music videos; very, very high quality  
13 production.

14 And they then disseminate them through a  
15 variety of channels and platforms, from the largest  
16 ones, FaceBook, Twitter, those that most people  
17 would have, to sort of fringe smaller ones, lesser  
18 known ones. And they have done so both directly and  
19 indirectly, meaning that ISIS had more than -- had  
20 several formal affiliated publishing houses,  
21 production companies that had their own websites and  
22 channels and Twitter accounts and FaceBook pages and  
23 so on and so forth.

24 But on top of that, ISIS counted on probably a  
25 larger number of unaffiliated sympathizers who

1 disseminated the propaganda broadly. That means  
2 these individuals who were not necessarily  
3 underground in Syria and Iraq, they could have been  
4 in far-flung places around the world, not  
5 necessarily formally affiliated with the group as I  
6 said, but sympathizers who took it upon themselves  
7 to disseminate the propaganda on a variety of  
8 platforms.

9 We are talking about on platforms like Twitter.  
10 For example, hundreds of thousands of accounts that  
11 the company has shut down in what is a regular cat  
12 and mouse game, where they shut down accounts, then  
13 ISIS supporters reopen them. But the magnitude of  
14 it is pretty impressive.

15 Q. Is it only propaganda or is social media used  
16 to communicate as well?

17 A. Well, there are different values to social  
18 media. Communication, meaning spreading the  
19 propaganda. Reaching as broad of an audience as  
20 possible is obviously the first goal for a group  
21 like ISIS, which has always tried to reach masses,  
22 tried to reach as broad of an audience as possible.  
23 Social media is the perfect place to do it.

24 But of course there's a second aspect, which is  
25 for people who are serious about it, people who get

1 engaged in the propaganda and want to mobilize, as  
2 we said earlier, want to do something.  
3 Communicating, talking one to one in more groups  
4 becomes very, very important. So ISIS would put a  
5 lot of resources in doing so, both directly and  
6 indirectly.

7 Directly means that it had a fairly large  
8 number of people, which are fighting on the ground,  
9 but at the same time communicating with supporters  
10 abroad, trying to reach them, trying to encourage  
11 them to join the group.

12 And indirectly meant that there what some  
13 people call fanbois at the time, it's sort of a  
14 diminishing term, but supporters all over the world  
15 who were kind of doing the same thing, which meant  
16 creating all these platforms and reaching out to  
17 people and communicating with them. The more  
18 serious the conversation --

19 MR. WHALEN: Objection to the narrative,  
20 Your Honor.

21 THE COURT: Sustained.

22 Q. (By Ms. Meeks) Do some of the social media  
23 platforms allow people to communicate directly from  
24 the battlefield?

25 A. Yes, they do.

1 Q. And are you familiar with an online platform  
2 called Zello?

3 A. I am.

4 Q. Are you aware that the defendant used Zello in  
5 this case to communicate with others?

6 A. I am.

7 Q. And are you familiar with the Zello chat or the  
8 Zello channel called State of the Islamic Caliphate?

9 A. Yes.

10 Q. Have you had the opportunity to review the  
11 transcripts of the defendant's statements on that  
12 Zello channel in this case?

13 A. I have.

14 Q. And what were your initial reactions to those  
15 transcripts?

16 A. Well, first reaction was the size of -- you  
17 know, quantitatively, a lot of information, a lot of  
18 activity taking place on that platform. I would say  
19 specifically when it comes to the -- the defendant,  
20 it was pretty clear he was somebody with fairly deep  
21 knowledge and understanding of ISIS, of its jargon,  
22 of its strategy, of its priorities, of its  
23 operations.

24 It wasn't somebody who was -- you know, we do  
25 look at a lot of people on these platforms, and

1 clearly comparatively, this was somebody who was  
2 very knowledgeable. And that knowledge is  
3 acknowledged by a lot of other people on the  
4 platforms that look up to him. I think that's also  
5 a dynamic that is pretty apparent, that he puts  
6 himself as somebody that is -- can impart knowledge,  
7 can motivate other people, and it's clear that  
8 people look up to him and ask him questions. He  
9 does not ask questions. He gives answers or gives  
10 very long sermons, if you will.

11 Q. And does it appear as though he would be in a  
12 leadership position?

13 A. Very much so.

14 Q. What is the level of sophistication that you  
15 normally see, and how does this compare to that?

16 A. If we look at it in an American setting, I  
17 would say this is very sophisticated; again, for the  
18 size of it, but also for the knowledge that exists.  
19 I mean, a lot of -- I used the term fanbois earlier,  
20 because a lot of ISIS sympathizers in the U.S. are  
21 not really knowledgeable about ISIS. They may be  
22 enthusiastic, but they don't really know much about  
23 it. Here the conversation is very different.  
24 There's significant knowledge of, as I said, the  
25 terminology, the strategy, the mindset behind it.

1 It's significantly more professional than the  
2 average.

3 Q. Is there an operational aspect to it that you  
4 don't normally see?

5 A. Bears repeatedly the conversation about people  
6 who have mobilized from the platform; the idea of,  
7 first of all, that people start talking on these  
8 platforms, and several examples are mentioned  
9 throughout the conversations of people who started  
10 their radicalization process on the platform but  
11 then mobilized, went beyond talking and traveled and  
12 joined ISIS.

13 And there is, in several conversations, this  
14 idea that this platform is created on purpose, to  
15 enforce the adherence to ISIS ideology, but then  
16 also to do something; it's not just talk, it's been  
17 to travel.

18 MS. MEEKS: Your Honor, with permission, I  
19 would ask that the witness and the jurors turn to  
20 their transcript books.

21 THE COURT: You know what? I think it's  
22 about time to take our morning break. It's been an  
23 hour and a half. Let's take a 15-minute break.  
24 Please remember not to talk about the case, and we  
25 will see you back here in 15 minutes.

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1 (Jury exits courtroom; recess taken.)

2 THE COURT: Everybody ready for the jury?

3 MS. MEEKS: We want the Court to know that  
4 at this stage we want to read in the transcripts  
5 that have already been admitted into evidence. We  
6 do not intend to play the corresponding audio.

7 THE COURT: Okay. All right.

8 MS. MEEKS: I just wanted to make the  
9 Court aware of that.

10 THE COURT: All right. Let's bring them  
11 in.

12 (Jury enters courtroom.)

13 THE COURT: Okay. Ms. Meeks, go ahead.

14 MS. MEEKS: Thank you, Your Honor.

15 Q. (By Ms. Meeks) Dr. Vidino, before we turn into  
16 going through the transcript book, I wanted to  
17 publish Government's Exhibit 52, which has already  
18 been admitted into evidence for your review.

19 Do you recognize what's marked as Government's  
20 Exhibit 52?

21 A. Yes.

22 Q. And is this a map of a portion of the Middle  
23 East?

24 A. That's correct.

25 Q. Can you just walk us through where the

1 countries are in relation to one another? And show,  
2 if you could for the jury, just discuss -- you had  
3 mentioned something about the border from Turkey to  
4 Syria. Can you talk a little bit about that so we  
5 have a visual?

6 A. Yeah, sure. So the top corner -- so  
7 basically -- well, Syria is right in the middle.  
8 The northern border is with Turkey, and that's a few  
9 hundred miles. That's really the main border  
10 through which most foreign fighters who joined ISIS  
11 traveled to, because it was easier to get into  
12 logistically, and ISIS operated mostly in the  
13 northern parts of Syria. So there's a -- that's a  
14 few towns on the border there. There's one called  
15 Gaziantep, right there. Those are the main border  
16 towns to which volunteers travel to from all over  
17 the world and then made the leap into Syria and  
18 often, you know, ISIS would have his own network of  
19 smugglers that could smuggle people across the  
20 border. But particularly at the beginning, it  
21 wasn't that difficult to cross. The Turkish  
22 authorities were not really patrolling the border  
23 very extensively.

24 Q. And where is Jordan and the West Bank in  
25 relation to Syria on the map?



1 A. The opposite side. It's on the southern part.  
2 You see Jordan, and next to it -- it says Israel,  
3 and right up there is the West Bank. So the border  
4 it shares is on the south.

5 Q. And then Iraq is over to --

6 A. Over to the west, that's correct.

7 Q. And does this comprise the Levant for what you  
8 were discussing earlier?

9 A. Yes, absolutely. It's the Levant -- this is  
10 basically a map of the Levant. The Levant would be  
11 basically all of Syria, Lebanon, which is the  
12 country that is between Syria and the Mediterranean  
13 and the sea; parts of northern Jordan and basically  
14 the West Bank and Israel, parts of it.

15 Q. Okay. Now I would turn your attention to the  
16 transcript binder, Dr. Vidino, specifically  
17 Transcript Number 204. It has corresponding audio,  
18 Government's Exhibit 203, but 204 in the transcript  
19 binders.

20 A. Yes.

21 Q. Okay. I'm going to read through some of this,  
22 Dr. Vidino, and then I will ask what your opinions  
23 are on certain portions. So this transcript  
24 reflects narrative by Said Rahim, the SR on the  
25 left.

1 THE COURT: Can we have a date on that?

2 MS. MEEKS: We do, Your Honor. This is  
3 September 24th, 2016.

4 THE COURT: Okay.

5 Q. (By Ms. Meeks) "Peace be upon you so with the  
6 mercy of God. Good morning and greetings from God  
7 to the supporters of the Islamic State, the  
8 supporters of the Islamic Caliphate State, special  
9 greetings full of the scent of er, musk, er, of the  
10 martyrs and shame and dishonor to the nation of  
11 infidels."

12 In your expert opinion, what does it mean when  
13 they are talking about the nation of infidels and  
14 martyrs in this context?

15 A. So he's greeting those that he thinks are, you  
16 know, people on the right side. The martyrs are  
17 people who die fighting jihad, martyrs of the  
18 Islamic State, and of course to greetings full of  
19 scent, musk; shame and dishonor to the nation of  
20 infidels. Infidels are non-Muslims.

21 Q. It continues:

22 "Greetings from God to the brother supporters  
23 and greetings from God to the lions of loyalty and  
24 disavowel, the lions of monotheism."

25 What does that mean?

1 A. Those are two terms that probably translated  
2 into English make very little sense. But they are  
3 two very common images used by ISIS and main  
4 jihadist circles. Loyalty and disavowel is a  
5 concept that means -- again, used by ISIS, not by  
6 all Muslims -- that Muslims should be loyal only to  
7 other Muslims and disavow and hate all non-Muslims.  
8 So a good Muslim, according to ISIS and ISIS  
9 supporters would be somebody that, you know, hates  
10 all non-Muslims.

11 Q. What is the lions of monotheism?

12 A. Again, lion is an image often used by ISIS.  
13 That's, you know, of course, somebody of value. And  
14 monotheism is, again, we discussed it earlier, the  
15 concept of believing in one God but in a very  
16 extreme form that ISIS adopts. So lions of  
17 monotheism would be true Muslims the way ISIS would  
18 see them.

19 Q. It continues:

20 "Greetings from God to those who pledge  
21 allegiance to the Emir of the believers, Abu-Bakr  
22 al-Baghdadi to listen and obey."

23 What is an Emir of the believers, and again,  
24 can you remind us about Baghdadi?

25 A. Baghdadi is the leader of ISIS. And in June of

1 2014, Baghdadi declared himself to be the Caliph,  
2 the leader of all Muslims. So the Emir -- Emir  
3 means the guide, the leader of the believers, of  
4 Muslims.

5 Here, clearly, there's an allegiance to  
6 Baghdadi and to ISIS. The vast majority of Muslims  
7 worldwide did not and do not recognize Baghdadi as  
8 the leader of all Muslims. Only an ISIS supporter  
9 would do so. So saying this clearly shows  
10 allegiance to ISIS.

11 Q. It continues:

12 "Greetings from God on the suicidal projects,  
13 greetings from God to the lone wolves, greetings  
14 from God to all the brothers, and greetings from God  
15 to the supporters."

16 What does he mean, suicidal projects or lone  
17 wolves?

18 A. Those, again, are sort of categories of  
19 individuals that in a way work for ISIS, if you  
20 will, or ISIS members. Suicidal projects  
21 interpreted to be the individuals that want to be  
22 martyrs, want to die for the cause of ISIS.

23 The lone wolves, that's, again, a term of art.  
24 It means individuals that carry out attacks on  
25 behalf of ISIS by themselves independently, as we

1 have seen often in terrorist attacks in the West.

2 Q. Continuing on line 21:

3 "Greetings from God to all the families of the  
4 martyrs, their parents, the children and relatives,  
5 greetings from God to them."

6 What does that mean in this context?

7 A. Again, there's the -- of course the idea of  
8 martyrs, those that die fighting for ISIS, occupy a  
9 special place in paradise, have a special honor.  
10 And the honor that comes with the martyrdom is also  
11 extended to their family, their parents, their  
12 relatives. There is this idea which is very common  
13 in jihadist circles, that if you die for God, if you  
14 die fighting jihad, you can intercede for your  
15 relatives, and you can reserve for them a special  
16 place in paradise.

17 Q. So is it an honor, then -- would it be  
18 considered an honor in the extremist communities if  
19 a relative had died in jihad.

20 A. Dying in jihad is the highest honor, again, in  
21 jihadist circles. And if you believe, of course,  
22 that interpretation of Islam, then having a relative  
23 who has died fighting jihad is a very big honor,  
24 yes.

25 Q. Continuing:

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1 "Greetings from God to our mothers who brought  
2 up lions and did not ... not sheep, brought up lions  
3 with sharp teeth and sharp nails, to attack and tear  
4 apart the enemies of the nation and the enemies of  
5 Islam from the Magi, Nusayris, and the Crusaders."

6 What is the enemy of Islam from the Magi, the  
7 Nusayris and the Crusaders?

8 A. Those are three terms of art used by the  
9 jihadist community to define three religious groups  
10 that ISIS doesn't like and fights. The Magi are the  
11 Zoroastrian. That's a very small religious group in  
12 Syria and Iraq that ISIS has been fighting. The  
13 Nusayris are the Ismael (phonetic) Shia, the other  
14 big sect in Islam, which also ISIS has been  
15 fighting, and the Crusaders are the Christians.

16 Q. And then we skip ahead to line 8 on this page  
17 2, where it says:

18 "I mean, we know that the martyr can also  
19 mediate for 70 of his relatives. So wait and keep  
20 on, keep on raising these lions."

21 Does that reference what you were talking about  
22 earlier?

23 A. Yes. Yes, that's exactly what I meant. So the  
24 martyr, somebody who dies fighting can mediate, can  
25 intercede for up to 70 of his relatives, meaning

1 he's -- up to 70 of his relatives can have a place  
2 in paradise because of his actions.

3 Q. Now I would ask you to turn to Government's  
4 Exhibit 294 in the transcript book, which has  
5 corresponding audio, 293, but 294 in the transcript  
6 book.

7 MS. MEEKS: The date of this transcript,  
8 Your Honor, is June 15th, 2016.

9 THE COURT: Thank you.

10 Q. (By Ms. Meeks) Again, starting with "SR" as  
11 representing Said Rahim on line 7, saying:

12 "Noted, noted; noted. Okay, er, the ones on  
13 mute should pray upon the Prophet Muhammad, may God  
14 bless him and grant him peace, and appease upon  
15 Abu-Bakr, 'Umar, 'Uthman and 'Ali, and upon our  
16 mother, 'A'ishah, may God be pleased with her, and  
17 then we will un-mute you."

18 What does that mean?

19 A. It fairly means extreme Islam salutation, I  
20 would say, because they are early followers of the  
21 Prophet Muhammad, the first companions of the  
22 Prophet Muhammad.

23 Q. Go down to line 23 on page 1, where a "UM",  
24 which is cited as an unknown male says:

25 "Upon our master 'Umar. Sheikh, er, I swear I

1 do not know, I do not know. I mean I read, so I  
2 want to learn from you."

3 What does that imply to you, and what does the  
4 word "Sheikh" mean?

5 A. Sheikh is a title that is given to somebody who  
6 is particularly knowledgeable and wise. It's an  
7 honorific title. So to refer to somebody as Sheikh,  
8 particularly in a religious context, means somebody  
9 that has, you know, important knowledge about  
10 religion. And the fact that this individual says,  
11 "I want to learn from you," that tells me that he's  
12 clearly looking up to the defendant as somebody who  
13 has important knowledge and from which he can learn.

14 Q. It continues on, then, with the defendant  
15 stating:

16 "All right, then, stay on mute to learn, that's  
17 better; stay on mute so you can learn how to listen  
18 to the brothers, to the scholars and learn and then  
19 we will look into your position."

20 To which the UM states:

21 "May God bless you, fine, Sheikh."

22 What does that tell you?

23 A. That this could be a subordinate position that  
24 this individual is taking in relation to the  
25 defendant. The defendant is clearly telling him



1 that this person being less knowledgeable about  
2 religion and about ISIS in general should just not  
3 speak and learn, and the other person clearly  
4 accepts that and calls him Sheikh, which, again, is  
5 a title that you would give to somebody who is very  
6 knowledgeable.

7 Q. Now I would like to turn your attention to  
8 Government's Exhibit 208, corresponding audio 207.  
9 But 208 in the transcript binder.

10 On 208, I will actually turn to page 2,  
11 starting at line 2.

12 MS. MEEKS: And the date on this, Your  
13 Honor, is September 24, 2016.

14 THE COURT: Okay. The participants are,  
15 again, the defendant and a user by the user name  
16 aaaa100.

17 So aa states on line 2:

18 "May God reward you, my brother, I am listening  
19 to your wonderful talking, God bless you."

20 To which the defendant replies:

21 "May God bless you, may God reward you with  
22 goodness. We ask God that these words I mean will  
23 enter your hearts and be beneficial, by the will of  
24 God, that these words will be beneficial, may God  
25 bless you.

1 "As we said, we, by the favor of God, glorified  
2 and exalted be He, er, are supporters and by the  
3 will of God, to be suicidal projects and jihadists  
4 for the cause of God, when I mean God facilitates  
5 the way for us. I mean be acknowledged my dear  
6 brothers, do not lightly -- do not take lightly  
7 these channels; do not take lightly these channels  
8 and/or the programs that support the Islamic  
9 Caliphate, whether on Zello, Paltalk, or Twitter or  
10 other communication means."

11 What does this reference to you? What does  
12 this mean to you?

13 A. The first individual who is thanking the  
14 defendant for his speeches, his wonderful talking.  
15 And what the defendant is saying, particularly in  
16 the second paragraph, is that everything that  
17 happens on this channels -- and he's referencing  
18 Zello, but also Paltalk, which is another platform  
19 that is very common among jihadists, or Twitter.

20 The conversations there are very important to  
21 basically create members of the Islamic State, to  
22 create individuals who become members of the Islamic  
23 State. When he says, "to be suicidal projects and  
24 jihadists for the cause of God," meaning do not take  
25 lightly what happens on these platforms, which is

1 not just talk, it is the talk that then brings to  
2 action.

3 Q. Does this reflect the importance of social  
4 media, as you were mentioning earlier?

5 A. I'm sorry?

6 Q. Does this reflect the importance of social  
7 media used by ISIS, as you were mentioning earlier?

8 A. Yes, absolutely. This is, again, what ISIS,  
9 itself, says constantly, that it's crucially  
10 important to have a presence on social media to  
11 create followers, to attract people, and to have  
12 sympathizers graduate to the next level, which means  
13 joining ISIS or carrying out attacks on behalf of  
14 ISIS.

15 Q. Continue on line 21, again the defendant:

16 "So praise be to God, the Lord of the Two  
17 Worlds, how many brothers mobilized, how many  
18 brothers mobilized with the grace of God, glorified  
19 and exalted be He, after they heard the words of the  
20 sheikhs of jihad! By God they mobilized..."

21 What is a sheikh of jihad?

22 A. Sheikh of jihad would be the knowledgeable  
23 individuals who know about jihad. Of course,  
24 according to the defendant's interpretation of  
25 those -- of who would be those, of course.

1 Q. Okay. And continuing on:

2 "I mean brothers; they used to say, 'What-what  
3 is this?' I mean in the beginning they used to say:  
4 'What-what is this? This is not doing me any good,  
5 it is just empty talk, empty words. They just talk  
6 and don't do-they do nothing.' But, when you see  
7 the honesty of those who talk about loyalty and  
8 disavowel, about loving for the sake of God and hate  
9 for the sake of God, you see these truthful mouths  
10 which speak of what God and the messengers said.  
11 You see the truthfulness, and you know that these  
12 individuals are truthful, and of course God is  
13 sufficient unto them."

14 Does this represent sort of a growth or a  
15 change or an evolution to you in the social media  
16 platform?

17 A. Yeah, because it just shows that the defendant  
18 is following exactly, taken a page from ISIS book,  
19 sees the importance of social media, that this is  
20 just not empty talk. This is the way to radicalize,  
21 recruit, and mobilize individuals.

22 The idea that individuals who, according, of  
23 course, to the defendant's interpretation, have  
24 honesty or are honest about their desire to please  
25 God, true social media can do something. That is

1 the gist of it.

2 Q. So it continues on line 13:

3 "So you hear them talking, but many of the  
4 brothers mobilized for the cause of God, glorified  
5 and exalted be He, and I am honored to be in this  
6 channel; some of the brothers who mobilized, and  
7 they are martyrs, we consider them alive in the  
8 presence of their God; martyrs. They are martyrs.  
9 They were in this channel, in this channel."

10 When he says, "they are martyrs, but we  
11 consider them alive in the presence of God," what  
12 does that mean?

13 A. According to the belief a martyr doesn't really  
14 die, dies in this world, but is still alive and very  
15 much occupying a place of honor next to God.

16 What he is saying is these martyrs who started  
17 their trajectory, their process on these channels,  
18 they went on, they died in battle, but they occupy  
19 this place of honor next to God. And they were in  
20 this channel, in this channel. So it really makes  
21 the point that its true channel -- to this specific  
22 channel and channels like this, that people join  
23 groups like ISIS and may achieve what is the highest  
24 honor, which is dying for God.

25 Q. Continuing on line 22, again the defendant here

1 saying:

2 "They would listen, listen, answer the doubts  
3 and defend the Caliphate State, but they detested  
4 themselves when they remained as speakers and feared  
5 on themselves as hypocrisy, as one of the brothers  
6 told me, we ask God to protect him, he is now  
7 jihadist with the Islamic Caliphate State. I do not  
8 want to-I do not want to mention his name for fear  
9 of hypocrisy, but he is one of the jihadists and was  
10 on this channel. We used to communicate. I would  
11 talk to him, and used to tell me he did not want to  
12 be one of the hypocrites that God talked about O ye  
13 who believe!"

14 What is he referring to here in terms of a  
15 hypocrite?

16 A. Hypocrite has a specific meaning, the original  
17 word in Arabic. The value of it is, those who claim  
18 to be Muslim but are not really Muslims because they  
19 don't act according to the tenets of Islam. This  
20 concept of hypocrisy, which groups like ISIS would  
21 use, which basically entails that only those who  
22 that really act as Muslims -- and according to ISIS,  
23 that would mean fight jihad -- are real Muslims.

24 So what the defendant here is saying is that  
25 there are other people that are on this channel,

1 including one specific individual, who are -- this  
2 fear of hypocrisy. So they fear that they're just  
3 all talk and they are not really doing anything,  
4 they are not really acting to further God's will.

5 But through those channels, it says, you know,  
6 we used to communicate, I would talk to him and then  
7 he mobilized and then joined ISIS. So he is no  
8 longer a hypocrite because he, you know, acted.

9 Q. Sure. It goes on, starting on line 18, to say:

10 "Yes, this is what he wanted; so God  
11 facilitated for him so he went to the land of the  
12 Caliphate, and he is now a soldier among the  
13 soldiers of the Islamic Caliphate State. Glory be  
14 to the Almighty God."

15 Continues on line 24:

16 "I swear, I am embarrassed to speak with him.  
17 By God, I am embarrassed. What am I going to say to  
18 him? I swear by God, what would I say? What would  
19 I say to him? That is it; he is now doing, doing,  
20 doing and not speaking much. He used to speak on  
21 this channel, but when he mobilized, that was it.  
22 His actions beat his words, and now his actions  
23 still beat his words. What should I say about  
24 myself, and what would you say about yourself? What  
25 do I say about myself? I judge myself: Am I a

1 hypocrite, am I one of those where God assigned unto  
2 my heart to be amongst those who lag behind? Does  
3 God hate my going? We perceive that I am not that  
4 ... that I am not that, and neither would you be.  
5 We perceive that God, I mean, will facilitate the  
6 time God, glorified and exalted be He, sees  
7 appropriate for you to say to you; mobilize and  
8 fight for my cause and be supporters of God."

9 What does it mean to you here when he's talking  
10 about not being a hypocrite?

11 A. He's mobilizing, means moving from talk to  
12 action. What he's saying is that he used to talk to  
13 one person and had these long conversations, and  
14 this person put his money where his mouth is; he  
15 actually mobilized and did something.

16 And what he's then saying -- and this is, I  
17 would say, quite standard recruitment incitement  
18 technique, in a sense that he's acting in sort of  
19 modesty, where he's saying, I'm not worth it. I'm  
20 not as good as these other brothers who mobilized.  
21 I'm all talk. And how about you? Why are we all  
22 talk and we're basically hypocrites because we're  
23 not acting.

24 So as much as he acknowledges the importance of  
25 the platforms, the platforms are propaedeutic; they



1 are the first step of what is really important,  
2 which is mobilization.

3 Q. What about the lines, "I mean, God will  
4 facilitate the time" -- it says, "I mean, will  
5 facilitate the time God." What does that mean to  
6 you?

7 A. Well, obviously, everything is perceived to be  
8 in God's hands, and it's God that will dictate the  
9 right time for when people mobilize. But of course  
10 there's a balance between what God decides, but also  
11 it's up to the individual to make the decision.

12 Q. And I point you, then, to line 25 on the same  
13 page. Again, the defendant:

14 "Some are businessmen. I mean, there was one  
15 whose social status was great, glory be to God,  
16 excellent, had everything from the world's goods;  
17 money, wife, and has the offspring, he had  
18 everything, and a profitable business, he had  
19 everything. He could have said, that's it, I will  
20 help the orphans and build mosques."

21 And then it skips a couple of lines, saying he  
22 went to mobilize.

23 What is the importance of leaving behind sort  
24 of what he was referring to as everything, a  
25 business, wife, worldly goods?

1 A. Yeah. There's this deep belief in sort of the  
2 jihadist community that worldly possessions and  
3 even, you know, family life and everything,  
4 everything is less important than fighting jihad.  
5 There is nothing in this world that is as important  
6 as fighting for God and dying for God. So the  
7 brother should leave behind whatever their life is,  
8 even if it's successful and happy and they have a  
9 good business, a good family life, that should be  
10 left behind to fight jihad. That's a very common  
11 belief.

12 Q. I will point you, then, to line 14 where it  
13 continues:

14 "Yes, honorable brothers, we incite you to go,  
15 especially those who are near the areas of the  
16 Islamic State. I am thousands of miles away from  
17 the Islamic State. But, those brothers who are  
18 close to the areas, to the areas by the Caliphate,  
19 the authority of the Caliphate, we incite and plead  
20 with you to mobilize for the sake of the God,  
21 glorified and exalted be He."

22 What kind of impact does this have?

23 A. I would say this is quite, quite powerful. It  
24 comes at the end of the whole speech, where  
25 basically calls hypocrites, which is a big insult in

1 sort of jihadist culture, for not doing, not acting  
2 and just being all talk, and here it's sort of the  
3 conclusion of that speech. It's very rhetorical, if  
4 you will, which is, we openly incite you, join the  
5 Caliphate. It's your duty. Leave behind your  
6 worldly possessions. Don't be a hypocrite, because  
7 that's a major sin in Islam. Go and join ISIS.  
8 That's pretty straightforward.

9 Q. Now, I turn to you Government's Exhibit 136  
10 with corresponding audio, 135.

11 And the date on this -- 136?

12 A. Yes.

13 Q. And the date on this is May 3rd, 2016. And  
14 this is an unknown male. States:

15 "Brother this channel is not for fatwas. This  
16 channel is to communicate with the Islamic State."

17 What is a fatwa again?

18 A. Fatwa is a religious decree.

19 Q. And does it mean to you, "This channel is to  
20 communicate with the Islamic State," does that have  
21 any significance to you?

22 A. I would interpret this as saying this channel  
23 is not for deep and long-winded theological debates,  
24 it's to actually talk to the Islamic State.

25 Q. And I will now ask that you turn to

1 Government's Exhibit 132 -- 132, with corresponding  
2 audio, 131.

3 MS. MEEKS: The date on this, Your Honor,  
4 is October 21st, 2016.

5 THE COURT: All right.

6 MS. MEEKS: And the participant is  
7 Ibn Dawla.

8 Q. (By Ms. Meeks) For this I just point you to  
9 line 15, where he says:

10 "As for those who want to create discord, we  
11 tell them this is the wrong channel. We do know one  
12 another, right or not? We know each other well. So  
13 take the mic and tell me why did you enter this  
14 channel? Did you go on this channel for the subject  
15 specifically or for something else? I mean, the  
16 subject you entered for must be more important than  
17 to talk about this subject. Go ahead and take the  
18 mic."

19 What does this mean, especially about discord?

20 A. Discord, I assume it's, again, an Arabic  
21 concept with the fitna, F-I-T-N-A, which is  
22 basically lack of consensus, sort of chaos. And the  
23 idea here is, this is not a channel to question  
24 ISIS, this is not a channel to have conversations  
25 about its merits, this is for supporters. So we are

1 not here to discuss the pros and cons of it. We are  
2 supporters, basically.

3 Q. So in what ways, based on what you have seen in  
4 the transcripts, would this channel be a benefit to  
5 ISIS?

6 A. On many levels I would say. It reinforces the  
7 belief -- I mean, people here tend to be already  
8 supporters. This is not a channel for people who  
9 are remotely interested, have some curiosity for the  
10 group. This is for people who are to -- supporters  
11 of the group already. It can be more or less  
12 enmeshed in it, but for people who have a fairly  
13 high degree of belief in the group's message.

14 It helps reinforce it. It helps these  
15 individuals feel like they belong to a community  
16 that could work for any kind of online chat, but  
17 obviously on any topic. And additionally, it gives  
18 them access to people who are part of the Islamic  
19 State, who are physically part of it. It allows  
20 them to communicate with individuals who can  
21 facilitate their recruitment by the group. That's  
22 the two bonuses that come with it.

23 Q. Now I request that you turn to Government's  
24 Exhibit 140, the corresponding audio of 139.

25 140, and the date on this September 19, 2016.

1 The participant is Said Rahim.

2 And actually specifically turn to page 2, and  
3 starting on line 20:

4 "Lately, I mean, two knights ascended and  
5 disembarked, two leaders, matchless leaders, great  
6 leaders, leaders of Loyalty and Disavowel,  
7 al-Shishani and al-'Adnani. We ask God to accept  
8 them both, both of them. They faced their death,  
9 one of them in the battles of Sharqat, God knows,  
10 and the second in Aleppo as he was checking on his  
11 soldiers. We are talking about al-'Adnani in a raid  
12 by the Cross, so praise be to God."

13 What is he talking about here with al-Shishani  
14 and al-'Adnani?

15 A. He's talking about two of the most prominent  
16 leaders of ISIS who were killed, both of them. So  
17 he's praising them highly and discussing their  
18 martyrdom.

19 Q. What was their significance with ISIS?

20 A. 'Adnani was de facto number two of ISIS and the  
21 main spokesperson, the one who ran external  
22 operations for ISIS and the one who called for  
23 attacks in the West. That was one of his main  
24 roles.

25 Shishani was arguably the best commander on the

1 ground; was a foreign fighter, was of Chechen  
2 background and was a very skilled commander and  
3 managed to become sort of a hero for ISIS supporters  
4 worldwide because of his skills and courage on the  
5 battlefield.

6 Q. Turn to page -- same exhibit, Government's  
7 Exhibit 140, but page 4 towards the bottom of the  
8 page, line 25:

9 "Attack them; disperse them, for this is the  
10 chance! There you see the infidel unite against us,  
11 so come on, unite and support one another to fight  
12 these. Come on and let us be one hand. Come on,  
13 let us fulfill the conditions of faith, complete the  
14 requirements of fate and jihad for the cause of God.  
15 We ask God, glorified and exalted be He, to open  
16 your hearts and that you mobilize to the land of the  
17 Islamic State. Or, if you are in infidel countries,  
18 that you become a lone wolf, a real lion in the area  
19 you live. As our sheikh al-'Adnani said, kill and  
20 do not consult anyone and do not seek anyone's  
21 fatwa. Yes, descend on the armies of the cross and  
22 kill them, because the origin about the infidel's  
23 blood is that it is to be shed and it is  
24 permissible."

25 What is he referencing here as, "our sheikh,

1 al-'Adnani said"?

2 A. It is a famous speech that 'Adnani, who is the  
3 spokesperson of ISIS gave in September 2014 where it  
4 called for attacks, and it was the first of a long  
5 series of speeches where it called for attacks on  
6 infidels, on non-Muslims, Christians in particular.

7 And the idea is that what 'Adnani stated and  
8 what the defendant is repeating here is that there's  
9 no need for fatwas, for religious decrees. There's  
10 no need for sophisticated mechanisms behind it, just  
11 go and kill. Kill them wherever they are with  
12 whatever tools you have. And what it says there  
13 is -- it's at the very beginning of page 5: "Let us  
14 fulfill the conditions of faith, complete the  
15 requirements of faith," meaning that it's a  
16 God-mandated duty. In order to be a true Muslim, a  
17 good Muslim, you have to kill infidels. It's  
18 mandated.

19 Q. And he mentions the lone wolf in regards to  
20 'Adnani as well.

21 Explain to us how 'Adnani's speech opened up  
22 the recruitment tool for ISIS?

23 THE COURT: How whose speech?

24 MS. MEEKS: 'Adnani, Your Honor.

25 A. The way -- ISIS was always, from the beginning,



1 before 2014, fairly open in the way that it accepted  
2 new members compared to other groups. But  
3 particularly after the speech that 'Adnani gave, the  
4 bar was set even lower, meaning that the message  
5 that 'Adnani put out is that anybody who carries out  
6 an attack on behalf of ISIS is basically an ISIS  
7 member. Even if that person has never traveled to  
8 Syria and Iraq, has never met an ISIS member, never  
9 interacted with an ISIS member, if in his heart he  
10 wants to be an ISIS member and if his actions  
11 reflect that, he kills infidels, basically he's a  
12 member of ISIS. That has been the model of many of  
13 the attacks we have seen in the West. So  
14 individuals who have no formal affiliation  
15 whatsoever to ISIS carry out the attack as a lone  
16 wolf -- that's a term that is often used --  
17 independently, complete operational independence.  
18 But ISIS, posthumously, after the fact, accepts them  
19 as members, as soldiers of ISIS. So ISIS would put  
20 out a press release saying, the soldier of the  
21 Caliphate -- meaning the ISIS member -- so-and-so  
22 carried out the glorious operation, so on and so  
23 forth.

24 So in a way, ISIS members should become  
25 something very open. The bar, as I said, is set

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1 very low. Anybody that acts to further ISIS's  
2 agenda is a member of ISIS.

3 Q. Now, if you could turn to Government's Exhibit  
4 172, corresponding audio 171. 172, the date is  
5 September 22nd, 2016. The participants are the  
6 defendant, Said Rahim, Ibn-Dawla, and then another  
7 person with the moniker, Abo-Malek1992.

8 I would ask you to turn to page 2, if I could  
9 direct you to turn to page 2 of that exhibit, line  
10 13, starting with the ID, Ibn-Dawla, saying:

11 "You lost the mic brother Angousha. You told  
12 the truth had this -- I mean, had this religion not  
13 been an ideology, it would have been that when the  
14 Prophet, God's peace and blessings be upon him,  
15 died, Islam would have ended. But Islam is an  
16 ideology, and it is not related to persons, but,  
17 glorified and sublime be God, it relates to God  
18 Glorified and Sublime be He. Go on, continue, you  
19 lost the mic."

20 In terms of this discussion about an ideology,  
21 why is that important?

22 A. What he's saying is that even those certain  
23 members of ISIS died, specifically 'Adnani, the  
24 message is still there, the ideology is still there.  
25 Everybody should pick up what -- what jihadists

1 would call the banner of jihad and fight. So it's  
2 not about affiliation, not about specific  
3 individuals, it's about an ideology that anybody  
4 anywhere can adopt.

5 Q. And it continues on line 22 with Defendant Said  
6 Rahim:

7 "May God bless you, God bless you. Our  
8 brothers, may God bless you and reward you with  
9 goodness for listening. May God bless you all. We  
10 do not deny that we love al-'Adnani. We love this  
11 lion. We always waited for his words, but I mean do  
12 we start with this martyrdom? No! No, I swear by  
13 God."

14 Does the defendant frequently discuss  
15 al-'Adnani in these transcripts?

16 A. Yes, very frequently.

17 Q. And does this -- is this also -- would you  
18 describe -- does it relate to an importance of  
19 carrying on -- you had mentioned that ISIS was  
20 losing territory at some point. Does this help  
21 support ISIS being relevant even without territory?

22 A. Yes, that is exactly the strategy behind ISIS  
23 in 2015, 2016, as they start to go on the decline.  
24 The idea is that anybody can pick up the banner and  
25 fight. Take the fight to the enemy. It doesn't

1 need to be in a structured way, but anybody can do  
2 it. And again, if people die, first of all it's a  
3 big honor to die in jihad. But the message goes on,  
4 the mindset goes on, and the ideology goes on. So  
5 it's not dependent on a specific individual.

6 Q. Now, I turn you to page 3, please, line 15.

7 Again, the defendant:

8 "This one, understand it: This man is going to  
9 his death, done, so how do you stop him. This one  
10 you cannot stop him unless you kill him. But Glory  
11 be to God. God facilitates and respites to these  
12 Inghimasi fighters so that they storm and leap over  
13 those wicked hyenas and kill them. I, one of the  
14 brothers told me Abu-al-Faruq, of course,  
15 Abu-al-Faruq, the channel's Admin, he sent me some  
16 pictures and sent some to the channel."

17 What is an Inghimasi fighter?

18 A. Inghimasi fighter is somebody who goes to a  
19 mission -- on a mission to kill as many enemies as  
20 possible, and it's a mission that is clearly going  
21 to lead to his death. So it's not like a suicide  
22 bomber where death is immediate, but it's basically  
23 the next thing, somebody goes, let's say, with a  
24 weapon, kills as many people as possible, but it's  
25 clear that the outcome is going to be death.

1 Q. Can you now turn to Government's Exhibit 222,  
2 with corresponding audio 221.

3 The date on 222, is May 31, 2016. The  
4 participants are Said Rahim and three unknown males.  
5 Starting on line 9 with Unknown Male:

6 "Oh, Islam, we are all willing to sacrifice for  
7 you."

8 Unknown Male 1 continues:

9 "Peace be upon you so with the mercy and  
10 blessings of God. Brothers: What...what is the  
11 legality of jihad in the land of the Caliphate  
12 State? May God reward you."

13 What is -- Dr. Vidino, what does it mean,  
14 "legality of jihad"?

15 A. The concept "legal" is very important.  
16 Everything that ISIS does has to be approved by --  
17 under Shari'a, under, of course, their own  
18 interpretation of Shari'a, which is fringe. But  
19 they have their own jurisprudence on a lot of terms,  
20 on the concept of jihad. When is it legal to fight  
21 jihad? When can you attack the enemy? When can you  
22 kill the enemy? Who is the enemy, and all these  
23 things.

24 So somebody is asking, what are the legal  
25 parameters of fighting jihad. It's a very normal

1 question. But people who are sympathizers of a  
2 group and not necessarily extremely knowledgeable  
3 about it ask whether their behavior is compatible  
4 with Islamic law.

5 Q. And then on line 15, the defendant responds:

6 "You said in the land of the Caliphate. It is  
7 a land where the Shari'a of glorified and exalted  
8 God rules. It is a land hounded by all nations of  
9 disbelief and all the powers of polytheism,  
10 atheists, seculars, Jews, and Christians to try to  
11 break this religion. Yes, this is what the Caliph  
12 and the official spokesman said, he mobilized  
13 people. This is what the soldiers of the Caliphate  
14 State say when we talk to them, that they mobilize  
15 people, not for a small number, but to attain this  
16 honor. This honor is not attained except by those  
17 whom God wills to honor and bless them with: To  
18 become a jihadist with God."

19 There's a lot there, but can you explain what  
20 this means, "the nations of disbelief and all the  
21 powers of polytheism, atheists, seculars, Jews, and  
22 Christians"?

23 A. It encapsulates ISIS worldview, which is only  
24 ISIS members and supporters are true Muslims, and  
25 they are building the real Islamic society, the real

1 Islamic State ruled by Shari'a, by Islamic law. So  
2 there is this sort of giant conspiracy against them,  
3 and these are some of the enemies that they see. So  
4 polytheism, which we discussed earlier; atheists,  
5 which don't believe in God; seculars; Jews;  
6 Christians; everybody that, according to their  
7 worldview, tries to attack true Islam and attack the  
8 Caliphate.

9 Q. Continuing on the second page, line 1,  
10 continuing with the defendant's statement:

11 "Jihad is an individual duty, it, jihad is now  
12 an individual duty, a duty, a mandate to defend or  
13 to raise the banner of 'There is no other God but  
14 Allah, the One and Only.' This is not just in the  
15 Caliphate land, but in every place where an  
16 unbelieving atheist exists, jihad is a duty. In any  
17 area where Christians exist, they are legal targets,  
18 or a Jew or atheist, or crusader, or where a  
19 Christian missionary preacher is, not a missionary,  
20 but someone who converts people to Christianity.  
21 All those are legal targets of the Islamic Caliphate  
22 State."

23 What is the importance of specifying a legal  
24 target?

25 A. Again, everything that ISIS does, from the

1 tiniest thing to biggest thing, which is killing  
2 people, has to be justified under Islamic law.  
3 That's how the group operates. Because they claim  
4 to hold Islam in its highest esteem, and everything  
5 needs to be done according to the parameters of  
6 Islamic law.

7 So what the defendant here is doing is de facto  
8 issuing a religious degree, a fatwa, where he is  
9 saying what is legal and what is not legal. You  
10 have other people on the chat room, on the channel,  
11 asking him for an opinion, and he's basically saying  
12 these are the legal targets, this is what is legal,  
13 this is what is not legal.

14 Q. Continuing on line 13 with the Unknown Male 1:

15 "May God reward you with all goodness to your  
16 brother. Brother, I have another question: What is  
17 the legality of pledging allegiance to the Emir of  
18 Believers in the land of the Caliphate, is it an  
19 individual or collective duty?"

20 To which the defendant responds:

21 "But there is an Emir of Believers, and the  
22 pledge to him is a must, and the pledge is  
23 obligatory to the Emir of the Believers. Pledge, I  
24 do not know where you are. And if you can immigrate  
25 to that land, then go, immigrate and pledge. Er,



1 the brothers beat you from Caucasia and crossed  
2 thousands of miles, and now they are in the land of  
3 the Caliphate. So I mean, pledge, because the  
4 pledge is obligatory."

5 What is the legality of this pledge they are  
6 discussing?

7 A. Again, exactly like he did for jihad earlier,  
8 he's issuing a decree, saying what is legal, what  
9 is -- and by "legal," we mean permissible under  
10 Islam or, more specifically, what is obligatory  
11 under Islam. What he's saying is that giving the --  
12 pledging allegiance to Baghdadi, to the head of  
13 ISIS, to the Caliph, is something obligatory at the  
14 individual level; that every Muslim should be  
15 pledging allegiance to the head of ISIS.

16 Q. And is that what Emir of the Believers  
17 represents?

18 A. Emir of the Believers means -- Emir means head,  
19 chief of the believers of the Muslims. And again,  
20 from an ISIS supporter's point of view, that means  
21 the head of ISIS who calls himself the Caliph;  
22 nobody else does.

23 Q. Does this type of legal advice further the ISIS  
24 mission?

25 A. Very much so, because it legitimizes what the

1 group does.

2 Q. Can I direct you now to Government's Exhibit  
3 214, with corresponding audio 213. The date on  
4 Government's Exhibit 214 is October 7th, 2016. The  
5 participants are Said Rahim, a user by the name of  
6 Abdul zuuuuz and an unknown male.

7 Starting on line 8 with the user AZ:

8 "May God reward you with goodness, may God  
9 reward with you goodness. May God reward you, God  
10 willing, glorified and sublime be He. But, sheikh,  
11 you, it is true, I mean, for the sake of the woman  
12 and two kids. I hope to conquer this thing, and  
13 I...willpower, I must have an excess of willpower.  
14 By God, the times I watch the video and chants  
15 thrills me and instigates me more to wage jihad. I  
16 swear by God and by God's will, I beseech God, that  
17 my destiny be in those lands there."

18 Is this -- what is he talking about? What is  
19 the importance of videos and propaganda? And how do  
20 you see that reflected here?

21 A. Textbook example of the power of propaganda.  
22 This is somebody who -- well, first of all,  
23 referring to the defendant as "sheikh," the honorary  
24 title who you give to somebody whose wisdom you  
25 trust, clearly says that the ISIS propaganda, he's

1 been watching the videos, the chants, they instigate  
2 me, they push me, they motivate me. And clearly  
3 this is somebody who was a consumer of propaganda  
4 and bad propaganda is pushing him to mobilize and  
5 wage jihad and move him from talk to action.

6 Q. I will ask you to turn on the same exhibit to  
7 page 4. So Government's Exhibit 214, page 4,  
8 starting on line 9. This is the defendant speaking:

9 "All right. What is the text of the pledge?  
10 The text is: 'We pledge allegiance to the Emir of  
11 Believers, Abu-Bakr, al-Baghdadi, to hear and obey,  
12 in times of difficulty and comfort, in hardship and  
13 ease, and to endure being discriminated against, and  
14 not to dispute about rule with those in power,  
15 except in the case of clear signs of disbelief,  
16 which there is a proof about it from Allah.'"

17 What is this pledge here? What does that mean  
18 to you?

19 A. This is one of the ways in which one pledges  
20 allegiance to ISIS.

21 Q. Is it also known as Ba'yat?

22 A. Ba'yat, yeah, in Arabic.

23 Q. Can I ask you to turn to Government's Exhibit  
24 128.

25 128 is dated April 23rd, 2016, and the

1 participants are Ibn Dawla and an unknown male. In  
2 this case, the unknown male is asking on line 7:

3 "Peace be upon you brothers. I have a friend  
4 who is present in European countries, and he wants  
5 to pledge allegiance to the Islamic State. What is  
6 the first thing that needs to be done? Peace be  
7 unto you brothers; may I ask a question? Honorable  
8 brother, by God, I have a friend present in Europe,  
9 and he wants to pledge allegiance to the Islamic  
10 State. Can he pledge allegiance while he is in the  
11 countries of Europe or when he comes or goes down to  
12 Syria."

13 And then I would just skip ahead slightly to  
14 page 2, if you could follow on line 11. And this is  
15 the other unknown male -- or the unknown male,  
16 rather:

17 "Dear brother, in about two or three months,  
18 God willing, he will immigrate to Syria. But now  
19 the opportunity is not -- or the opportunity is not  
20 available now. He wants to pledge allegiance. So  
21 can he now, while in the European countries, to  
22 pledge allegiance or not?"

23 Ibn Dawla responds:

24 "Abu-Bakr, forgive me, by God, I did not meant  
25 to. Take over, take over."

1           The unknown male says: "Don't worry, honorable  
2 brother, don't worry. No problem, God willing, no  
3 problem."

4           Then Ibn Dawla continues:

5           "As I told you brother, he can pledge  
6 allegiance, he can pledge allegiance brother. We  
7 all pledged, even though some of us are not in  
8 Muslim countries. Pledge allegiance brother; tell  
9 him to pledge allegiance and may God accept this  
10 from him."

11           Why is this important to be discussing why  
12 people are in Muslim countries to pledge allegiance?

13 A. Well, again, the idea is that -- the  
14 conversation here is, how do you pledge allegiance  
15 to the Islamic State, and can you do so even if you  
16 are living very far away, in European countries and  
17 Western countries and so on. And Ibn Dawla is sort  
18 of giving explanation to the person who is asking  
19 those questions, saying that is not a problem, it  
20 can be done in any place. You can pledge allegiance  
21 where you are.

22 Q. Next page, page 3, starting on line 4 --  
23 actually starting on line one with the unknown male:

24           "Okay. So what is the thing he must do after  
25 he pledges allegiance, or before he pledges

1 allegiance now?"

2 To which Ibn Dawla replies:

3 "Brother Abu-Qatadah, seems you did not  
4 understand the brother. I mean, to begin with, he  
5 has to know why he is pledging allegiance. If he  
6 pledges allegiance, then it has to be to listen and  
7 obey. If they say strike, then he strikes. If they  
8 say come, he comes. And if they say do that, he  
9 does. Because you pledge to listen and obey, you  
10 pledge unto death, and fighting for the cause of God  
11 wherever you are."

12 Now, what is the importance of what he is  
13 saying here?

14 A. It tells the -- his interlocutor what the  
15 consequences of pledging allegiance is, the  
16 importance of it, and that basically once you pledge  
17 allegiance, you blindly obey to the group.

18 Q. This is different from the statement that was  
19 given earlier -- or that we read last time with an  
20 actual pledge of certain words.

21 In your experience, is there more than one way  
22 to pledge allegiance or to pledge Ba'yat?

23 A. Yes, very much so.

24 Q. And what do you find to be the most common  
25 theme in them?

1 A. There's almost an individualized way of  
2 pledging allegiance. We often see, for example,  
3 when individuals carry out attacks, and then they  
4 release a video that they have taken. They are a  
5 very almost a personal individualized way of  
6 pledging allegiance, because obviously you declare  
7 your full faith and obedience in the Baghdadi, the  
8 head of ISIS, but there are different wordings being  
9 used.

10 Q. Can there be formal or informal process to it?

11 A. Yes.

12 Q. And is it necessary to pledge allegiance in  
13 order to be a member of ISIS?

14 A. I would say there's this two-tier system, where  
15 there's a formal way in which you pledge allegiance  
16 and so on and so forth. But as we said earlier,  
17 actions matter more than words. So if you do  
18 something on behalf of ISIS and clearly state that  
19 that is to further ISIS agenda, the formalities of  
20 pledging become secondary.

21 Q. Is there any typical age that you see of people  
22 who would either pledge or who would consider  
23 themselves members of ISIS?

24 A. Generally people in -- I mean, there's all  
25 kinds of groups. There's people in their early

1 teens, if not actually preteen, and people in their  
2 50s and 60s are sort of the outliers. I would say  
3 the majority are in their early- to mid-20s.

4 Q. Let me direct you now to Government's Exhibit  
5 190, with corresponding audio, 189.

6 Government's Exhibit 190 is dated December 16,  
7 2016, with a participant Rami Rhal and a participant  
8 Said Rahim, the defendant.

9 Starting on line 7, the defendant is saying:

10 "Okay, greetings and may God bless you my  
11 brother, may God bless you. By God, I mean you can  
12 my dear brother...God's greetings and we thank, I  
13 mean for the kind words. We do not look at your  
14 age, may God bless you, whether you are eight years  
15 old or four years or ten years; it does not matter,  
16 rather what your creed down deep in your heart is,  
17 the creed of al-Wala' wal-Bara'."

18 First, what does he appear to be talking about  
19 here?

20 A. He's talking to somebody that seems to be of a  
21 very young age. And what he's saying -- and I think  
22 it's interesting that it says, "We do not look,"  
23 which he does often, which shows he clearly  
24 identifies with ISIS. We do not look at your age,  
25 we do not look at your background, how young you



1 are, which is pretty much how ISIS has acted. ISIS  
2 has accepted very, very -- some ISIS propaganda  
3 videos show children who must be nine, ten, who are  
4 fighting for the group.

5 Q. And do you know what the creed of al-Wala'  
6 wal-Bara' means?

7 A. That is the expression we have used before but  
8 not translated, which is loyalty and disavowel. It  
9 is a doctrine that states that all loyalty should be  
10 to Muslims and to non-Muslims, one should have only  
11 hatred and disavowel. So we used it before, it's  
12 used very often, just in most other transcripts it  
13 was translated into English, but it was originally  
14 in Arabic.

15 Q. Continuing on line 15, again, the defendant:

16 "Meaning, may God bless you, you can now, I  
17 mean according to the area, to attack, I mean, as  
18 the Emirs of the Islamic State and the official  
19 spokesman of the Islamic State said, 'Be a lone  
20 wolf,' if you are able to do something in Turkey, so  
21 I mean attack the infidels and the apostates, the  
22 Turks, the Turkish police; if you are able to kill  
23 them, then do so. If you can burn their businesses  
24 or burn their homes, I mean the government officials  
25 and police cars, to kill police individuals. If you

1 can do that, then do it. If you cannot, then  
2 immigrate to the Islamic State, immigrate to the  
3 Islamic State and train there. And by the will of  
4 God, the Lord of the Worlds, you will be, I mean,  
5 you will be an active member that wages jihad  
6 against the infidels. I do not know if you have  
7 anything available to you, I mean, police or such,  
8 attack and kill them, good riddance, good riddance!"

9 Does it appear he's still talking to the same  
10 individual?

11 A. Yes. The same conversation, yes.

12 Q. Same conversation.

13 And what is he saying here?

14 A. It's basically highlighting what is the  
15 two-prong course of action that ISIS has constantly  
16 consistently put out. If you are an ISIS supporter,  
17 whatever your degree of membership, whether you are  
18 a formal member or not, you can do two things to  
19 further ISIS' agenda. Either you migrate, you join  
20 the group physically, you travel to territory where  
21 ISIS operates and fight in jihad military, or you  
22 stay where you are, but you carry out attacks. And  
23 you pick your targets. In this case he's talking  
24 about police, but you pick your targets, your  
25 methods of attack, the way you see fit. Both

1 decisions, both choices further ISIS agenda.

2 Q. Even to -- for young people, even to children.

3 A. Yes. And we have seen cases of minors involved  
4 in attacks. We have seen a case in Germany of a  
5 12-year-old who built an explosive device that  
6 almost went off in a Christmas market in Germany.

7 Q. Does the defendant often call for attacks  
8 against Turkey?

9 A. Yeah, very commonly.

10 Q. Tell us about Turkey. Is it predominantly  
11 Muslim?

12 A. Yes, 99 percent Muslim.

13 Q. What is it about Turkey that is important in  
14 relation to ISIS?

15 A. Turkey had sort of a big change in policy when  
16 it comes to ISIS. In the early days of the ISIS  
17 mobilization of the Syrian conflicts of 2011, 2012,  
18 2013, Turkey had, let's say, a lax migration policy.  
19 Maybe it allowed a lot of people to go from Turkish  
20 territory to Syria. And then with time, it changed  
21 and reversed that policy and started cracking down  
22 on ISIS networks. They were smuggling people from  
23 Turkey to Syria and ISIS support networks throughout  
24 Turkey. So that caused, of course, a lot of anger  
25 within ISIS and a lot of retaliation. So we have

1 seen many attacks, planned or successfully carried  
2 out by ISIS in Turkey over the last few years.

3 Q. Can I turn you now to page -- I'm sorry, to  
4 Government's Exhibit 176, 176, with corresponding  
5 audio 175.

6 And in this Government's Exhibit 176, the date  
7 is December 16, 2016, and participant is Said Rahim.  
8 Actually, turn to page 2, starting at line 10, the  
9 defendant saying:

10 "So, I mean, I know there is a large number of  
11 the brothers are present, I mean in the Syrian land.  
12 In Turkey, I don't know, maybe there is a million, a  
13 few million. Let's say there is a 100,000, 100,000.  
14 I mean, if about 20- or 30,000 of those were lone  
15 wolves -- and by the way, I am being modest with  
16 numbers -- if there were 30,000 lone wolves, oh,  
17 man, that is it. It will be raised. The call to  
18 prayer will be at the forbearing mosques, and over  
19 there the Caliphate banner will be raised. Attack  
20 them. But we ask God for that, we ask God for  
21 that."

22 And the next line he says:

23 "Take this matter seriously, and I mean not  
24 jokingly."

25 How do you interpret this?

1 A. He's basically saying that there is a large  
2 presence of ISIS supporters in Turkey. When he  
3 talks about brothers, that means ISIS supporters.  
4 He guesstimates the numbers, but it's an imaginative  
5 20- to 30,000 lone wolves, so individuals that carry  
6 out attacks independently, were to do so, were to  
7 carry out attacks. So imagine what kind of upheaval  
8 that would cause in Turkey, and the banner of the  
9 Caliphate would be raised. So basically Turkey  
10 would be defeated, would be conquered and would  
11 become part of the Caliphate.

12 The Caliphate has always been that of  
13 expanding. ISIS always saw the territory occupied  
14 as Syria and Iraq as the starting point of the much  
15 larger conquerors. So imagine if we had 20-, 30,000  
16 terrorist attacks in Turkey carried out by lone  
17 wolves, that would lead to the conquest of Turkey to  
18 the Caliphate.

19 Q. And do you interpret this to be a matter to be  
20 taken seriously? What does that mean to you?

21 A. It openly calls for attacks in Turkey.

22 Q. Can I now ask you to turn to Government's  
23 Exhibit 182? 182. The date on this is July 15th,  
24 2016. The participant is Said Rahim. And actually  
25 on 182, please turn to page 7, starting on line 5.

1 The defendant saying:

2 "Okay. What did al-'Adnani say? His words has  
3 a huge impact, by God's grace, and very, very, very  
4 good effect. Every monotheist Muslim who kills  
5 those unbelievers is a good deed and a reward  
6 according to our sheikh al-'Adnani. And more, call  
7 it what you want from God, may he be glorified and  
8 exalted. Because, I mean, we remember when he said:  
9 'Kill and do not consult anyone and don't ask for  
10 any fatwa, er, kill him by any means. Smash his  
11 head on the wall, spit in his face, burn his plant,  
12 I mean anything, anything; poison him, anything.  
13 Praise be to God, the Lord of the Worlds. This  
14 person who carried out this operation, I mean this  
15 is a truck. The truck is not a car. The truck, our  
16 brothers, is very huge. I mean it weighs tons. It  
17 weighs hundreds of tons. And if it was on a  
18 specific speed, I mean a high speed, then glory be  
19 to God this one, glory be to God. God blessed this  
20 operation."

21 Do you know what he's referring to here?

22 A. He is referring to the terrorist attack that  
23 took place in Nice, France, the day before.

24 Q. What does he mean by 'Adnani -- what do you  
25 interpret it to mean by when he says 'Adnani's words

1 had a huge impact?

2 A. 'Adnani, starting September of 2014, but  
3 repeatedly issued calls, very public calls to all  
4 ISIS supporters to carry out attacks, to take  
5 matters in their own hands and carry out attacks  
6 independently. And some of the language here is  
7 very much the language originally used by 'Adnani  
8 which is, take any tool you have, a car, a truck, a  
9 knife, a weapon, poison, punch them, carry it  
10 wherever you find the enemy, which is in infidel  
11 territory everywhere, kill them, no matter how, no  
12 matter where you do it. That's very much the  
13 language and clearly here is talking about the  
14 truck, the attack with the truck. That's the day  
15 after Nice.

16 Q. Can you please turn to Government's Exhibit 208  
17 with corresponding audio, 207.

18 The date on 208 is September 24th, 2016. The  
19 participants are Said Rahim and the user aaaa100.

20 Please turn to page 2 of Government's Exhibit  
21 208, starting at line 2 with user aa:

22 "May God reward you my brother. I am listening  
23 to your wonderful talking. God bless you."

24 To which the defendant says:

25 "May God bless you. May God reward you with

1 goodness. We ask God that these words I mean enter  
2 your hearts and be beneficial by the will of God  
3 that these words will be beneficial. May God bless  
4 you.

5 "And as we said, we, by the favor of God,  
6 glorified and exalted be He, are the supporters, and  
7 by the will of God to be suicidal projects and  
8 jihadists for the cause of God, er, when er, I mean  
9 God facilitates the way for us. I mean, be  
10 acknowledged my dear brothers, do not take lightly  
11 these channels, do not take lightly these channels  
12 and the programs we support on Zello and Paltalk.  
13 How many brothers mobilized? How many brothers  
14 mobilized with the grace of God?"

15 What is he talking about here?

16 A. He's talking about the importance of platforms,  
17 like Zello, Paltalk and Twitter in solidifying the  
18 adherence to ISIS message by -- by people on those  
19 platforms; how everybody is sort of a suicidal  
20 project, aspiring jihadists for the cause of God,  
21 and that the conversations, the communications and  
22 the contacts on those platforms help creating actual  
23 soldiers of the Caliphate.

24 Q. Can you please turn to Government's Exhibit  
25 140.



1 On page -- Government's Exhibit 140 is  
2 September 19, 2016. Participants Said Rahim. On  
3 page 2, line 9, the defendant stated:

4 "How many of the brothers in this channel are  
5 martyrs? We believe them to be so, and God is their  
6 witness...Martyrs, they are martyrs; they were here  
7 and they mobilized to the Caliphate country and  
8 pledged allegiance to listen to and to obey the  
9 Qurayshi, the Emir of the believers, Abu-Bakr  
10 al-Baghdadi. They pledged allegiance to him and  
11 became the best soldiers to the best state."

12 Again how do you interpret this?

13 A. This is probably a very open way of saying that  
14 many of the brothers who are on this channel, on  
15 Zello, on the specific channel on Zello, moved  
16 from -- again, just speaking to actions. So we  
17 became martyrs. We joined the Caliphate, became  
18 martyrs. They died while fighting for ISIS. And  
19 after pledging allegiance to Abu-Bakr al-Baghdadi,  
20 Qurayshi is the name of the tribe to which the  
21 prophet Mohammed belonged to and to which he claimed  
22 to be a member of. So people on this channel, they  
23 mobilized, they died.

24 Q. Can you now turn to Government's Exhibit 160,  
25 please. Government's Exhibit 160, with

1 corresponding audio, 159, dated August 16th, 2016.  
2 The participants are Said Rahim and an unknown male.

3 Starting on line 7 with the unknown male:

4 "Praise be to God. Blessed be to God. Praise  
5 be to God. Blessed be to God. This is elating  
6 news, Angoushah, that there are brothers from the  
7 room who have mobilized, and I mean arrived.  
8 Paltalk. I left Paltalk. Paltalk has a lot of  
9 problems you, er, I mean, you are aware of such. So  
10 for this reason I left it. Abu-'Abd-al-Raham  
11 al-Jazrawi, I hope by the will of God that he  
12 mobilized and arrived to --"

13 And the defendant interrupts, saying: "No, no,  
14 no, no, no. No. Not like that, and then I told you  
15 on the private, I mean, I will tell you who. No,  
16 no, Abu-Uways is a long time ago, too. He last  
17 entered a few months ago."

18 What does this mean, "on the private"?

19 A. On the private means on the one-on-one  
20 conversations. A lot of communications among  
21 jihadists, ISIS supporters, have been on two levels  
22 online. One is more public settings like this. But  
23 when the setting becomes more operational, they move  
24 to a private setting because they are aware that law  
25 enforcement might be monitoring those conversations.

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1 So they move it from where it's fairly easy for law  
2 enforcement to detect the conversation, to a private  
3 setting where they think they cannot be detected.

4 Q. Is that common behavior that you see?

5 A. Very common. Most people in the space would  
6 have a variety of accounts on different platforms.  
7 And again, operate on the more public ones in a  
8 fairly open way, because that's where you need to  
9 operate to recruit new people, to interact with new  
10 people. But once you have established a trust-based  
11 relationship with your interlocutor, you are going  
12 to move to places like Snapchat or different other  
13 platforms where there is a high level of encryption  
14 and it's more difficult for law enforcement to  
15 monitor the conversation; very common.

16 Q. Can I now point you to page 2 of the same  
17 exhibit, Government 160, line 6. This is, again,  
18 the defendant speaking, saying:

19 "There are brothers that mobilized...there are  
20 brothers that were on our side in the West Bank that  
21 mobilized, one of them mobilized, praise be to God.  
22 There is one from the land of the two Holy sites  
23 mobilized a while ago, too. By God, those are good  
24 brothers and mobilized, I mean mobilized, and the  
25 reason behind it was the channel, I mean praise be

1 to God. Some...by the grace of Almighty God of  
2 course, the channel, those who mobilized did so  
3 because of the channel, that is what I mean."

4 First, can you tell us what he means by West  
5 Bank and the two Holy sites?

6 A. The West Bank is Palestinian territories west  
7 of the River Jordan, so Jenin, Guatemala, part of  
8 the Palestinian territories, the West Bank.

9 And the land -- I'm sorry, and the land of the  
10 two holy sites are in Saudi Arabia. The two holy  
11 sites in Islam are Mecca and Medina. Both cities  
12 are in Saudi Arabia. So it's a way of saying Saudi  
13 Arabia. So basically here, it means it was two  
14 individuals, one from Palestinian territories and  
15 one from Saudi.

16 Q. Would those also be considered foreign  
17 fighters, what you were talking about earlier?

18 A. Yes. They are not from Syria and Iraq, so they  
19 are foreign fighters, yes.

20 Q. Do foreign fighters -- do you ever see, in your  
21 experience, foreign fighters go the battlefields and  
22 then return to their homeland later?

23 A. Yes, that happens.

24 Q. What is -- what is the result of that -- or  
25 rather, why -- why would a person travel to -- to

1 commit jihad or to fight on the battlefield and then  
2 return to their homeland?

3 A. Different reasons. Every case is different. I  
4 mean, people go and fight to help the cause, of  
5 course. And then whether it's personal reasons,  
6 that conflict is over or, you know, the person no  
7 longer wants to participate in that conflict or he  
8 thinks that he can carry out a mission somewhere  
9 else. So there are different reasons people go  
10 back.

11 Q. Will they typically become more radicalized  
12 while in the Caliphate lands?

13 A. Again, every case is different. But generally  
14 speaking, yes, of course, big and better  
15 environment; fighting surrounded by like-minded  
16 individuals; generally that mindset. You have cases  
17 of people who actually abandon the mindset after  
18 that experience, they become very disenchanted with  
19 it. But in most cases, yes, it enforces the  
20 allegiance to the group.

21 Q. Please turn to Government's Exhibit 152; 152 of  
22 corresponding audio 151. Government's Exhibit 152.  
23 The date is August 17th, 2016, and the participant  
24 is Said Rahim.

25 Please turn to page 2, starting on line 15:

1 "This is the pathway. So brothers, where are  
2 the men! Where are the men! Where are those who  
3 gave Almighty God the pledge of death! Where are  
4 those who will respond to the one calling for jihad!  
5 Come to jihad. Where are you men? Where are you?  
6 Days and years keep passing and time is running out  
7 quicker than lightning. Jihad has been there for  
8 many, many years. Some mobilized and some stayed  
9 behind. Er, brothers are trying, and we perceive  
10 you to be from those who try to mobilize to jihad  
11 for the cause of God."

12 Would you consider this to be recruitment for  
13 ISIS?

14 A. Yeah, very much so. I think he's striking a  
15 cord. Basically what he's appealing to is sort  
16 of -- almost making fun of people, egging on people  
17 who haven't mobilized. Where are the men? Where  
18 are the men? It's appealing to that sense of  
19 manhood, if you will. You have to stop just  
20 talking, and you have to mobilize.

21 It's -- again, there's different tactics to  
22 radicalize and recruit and push the mobilization of  
23 individuals. There's at times a softer approach, at  
24 times the more explaining things, and at times  
25 there's almost the egging on, almost making fun of,

1 where are the men?

2 Q. So can you please turn to page 3 of the same  
3 exhibit, line 6.

4 The defendant continues:

5 "Where are those who rolled or will roll their  
6 sleeves or those who will throw themselves! Where  
7 are those who tied or will tie the red headband on  
8 their foreheads, the death headband! Where are you?  
9 Where you are? 'Verily those who plight their  
10 fealty to thee do no less than plight their fealty  
11 to Allah: The hand of Allah is over their hands...'  
12 Give pledge of allegiance to God so you could  
13 witness the blessing -- so you could witness the  
14 blessing of jihad for the cause of God, glorified  
15 and exalted be He. Where are you men? We heard the  
16 screams of our sisters, in the West and the East.  
17 We heard the calls for help of the children. Yes,  
18 we saw the houses...we saw bodies as they burn and  
19 houses being destroyed. We saw Quran being burned.  
20 So where you are men of Quran! 'Go ye forth,  
21 whether equipped lightly or heavily, and strive and  
22 struggle...in the cause of Allah,' before that day  
23 comes where you may deeply regret it brothers. Our  
24 brothers, and we specify those brothers that are  
25 close, the close ones that are only centimeters away

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1 from the Caliphate Islamic land. Brothers! What  
2 are you waiting for? What are you waiting for?"

3 Does this fit within the techniques used by  
4 ISIS to motivate new recruits?

5 A. Yeah, very much so, like the above. It's  
6 pushing people to go trying -- first of all, using  
7 certain imagery of the suffering of Muslim  
8 population in Syria and Iraq, the children, the  
9 house being burned, the Quran being desecrated.  
10 Those are very common motivational tactics used by  
11 recruiters, you know, trying to motivate people in  
12 that way. And then again it reverts to the sort of  
13 the approach, where are the men, the men of the  
14 Quran, sort of egging on. And as you are referring  
15 specifically to people who are close to the land of  
16 the Caliphate, so those in the region.

17 Q. Would that also include the region of the  
18 Levant that we saw a map of earlier?

19 A. Yes.

20 Q. Please turn to Government's Exhibit 194; 194,  
21 with corresponding audio 193. The date on this is  
22 December 19th, 2016. The participant is Said Rahim  
23 and another participant with the shorthand AE.

24 Please turn to the bottom of the page of 1 on  
25 line 28, where the defendant is saying:



1 "So when will you rise up? When will you rise  
2 up? I mean, attack the policemen with shoes,  
3 slippers and stones. Do anything, but do not stand  
4 idle doing nothing. I mean, you are being consumed,  
5 for here come the Magi. I mean they expropriated  
6 your homes and lands. So rise up, rise up! I mean  
7 there are many millions in Turkey, so rise up. I  
8 mean, what are you waiting for? Here we appeal to  
9 the brothers in al-Sham land that are present  
10 currently in Turkey; we appeal to them to attack the  
11 false leaders, members, government establishments,  
12 airline companies, police stations, government  
13 centers, movie theaters and tourism places, attack  
14 them. Set fire to Turkey. Damn Erdogan, damn the  
15 infidel."

16 Can you tell us who Erdogan is?

17 A. President of Turkey.

18 Q. It continues:

19 "I mean, they sold you. 'Allush sold you out  
20 and this...Erdogan sold you out, he sold you out.  
21 So when will you stab him with a dagger as he  
22 stabbed you? God is the one sought for help. I  
23 mean, God willing, I would find listening ears. I  
24 mean, we addressed the appeal days ago in the Arabic  
25 language, so I mean in the Arabic language so the

1 Arabs who would understand the Quran language would  
2 respond, but only one of the Turkish brothers  
3 responded; there is no power and no might except by  
4 God. What are you waiting for?"

5 "I would find listening ears," what does that  
6 mean to you?

7 A. He is making repeated appeals to mostly Arabs,  
8 ISIS supporters living in Turkey, to carry out  
9 attacks to rise up against Turkey, particularly  
10 trying to mobilize the Syrian refugee community,  
11 which is very large, that exists in neighboring  
12 Turkey, to rise up against the government and carry  
13 out attacks and so on.

14 Q. And on the next page, the user AE responds on  
15 line 5, page 3:

16 "Peace be upon you with the mercies and  
17 blessings of God. May God grant you long life  
18 Angousha. May God bless you; what you say is  
19 correct."

20 What's the importance of a response like that?

21 A. It creates a sense of community. This is not  
22 a -- the channel here is not a place for dissent.  
23 People agree, creates a cohesive community there,  
24 and it reinforces the belief of everybody. So the  
25 defendant is often the one making the longest

1 speeches and the one sort of pushing the envelope,  
2 and everybody else in the community agrees, praises  
3 him and looks up to him. That's sort of the normal  
4 dynamic here.

5 Q. And do you see that several times throughout  
6 the transcripts that you have reviewed?

7 A. Consistently.

8 Q. Can you please turn to Government Exhibit 122,  
9 the date on the corresponding audio 121. The date  
10 is September 19th, 2016. The participants are Said  
11 Rahim, a user Hammudi44, and a participant  
12 Ibn Dawla.

13 Starting on line 8 with the defendant:

14 "Okay, peace be upon you, greetings from God.  
15 I mean it seems like this person is a neighbor of  
16 mine, but I don't know...are you from the 48 region"

17 What does that mean, 48 region?

18 A. It refers here to the war of 1948, when the  
19 state of Israel was created. And the -- so the 48  
20 region would be the region of Palestine that has  
21 become Israel.

22 Q. So he continues:

23 "You, the user who wrote that you speak Hebrew  
24 and Arabic, are you from the regions of Hamas, Gaza  
25 or from the West Bank regions of 'Abbas? You don't

1 have to be specific exactly, but from which region?

2 Arabs of 48, the West Bank, Hamas or Gaza."

3 Can you explain this to us?

4 A. It's the three main jurisdictions in which  
5 Palestinians live in the region. So Arabs of 48  
6 would be the Arabs that live in what is today  
7 Israel. West Bank is the part where Palestine  
8 authority rules. And then Gaza is the part where  
9 Hamas rules, and it's the part between Egypt and  
10 Israel. So the Palestinians basically live in these  
11 three adjacent areas, but from a legal point of view  
12 separated. He's trying to localize where this  
13 individual is from; he's Palestinian, but from what  
14 territory in which the Palestinians live.

15 Q. Is that part of the Levant that we saw earlier,  
16 the map of the Levant?

17 A. Yes.

18 Q. Ibn Dawla responds:

19 "He's all yours Angousha, please forgive me, by  
20 God brother. He's all yours, he's all yours, bring  
21 us good news about him my brother. I mean he's from  
22 the region and you know its people better."

23 Then the individual replies:

24 "The best Mike, no, by God, I'm from the West  
25 Bank and forgive me."

1           Then if you can turn to you page 2, please,  
2           starting on line 1, the defendant says:

3           "Then you are from the West Bank. He's a  
4           neighbor, a neighbor of mine; a neighbor of mine.  
5           Greetings from God; welcome. I am from the West  
6           Bank regions but a supporter for the Islamic State;  
7           a supporter of the State of the Islamic Caliphate.  
8           Er, greetings from God. Okay, you, now, may God  
9           bless you."

10           Again, so the West Bank, what does that  
11           represent?

12           A. It's the region between where the Palestinians  
13           live, where the Palestinian authority rules, and  
14           it's between Israel and Jordan.

15           THE COURT: Ms. Meeks, I think it's time  
16           to take our lunch break, so I would like to break  
17           until 1:30.

18           Before you go -- step down, please. Go  
19           ahead and step down.

20           THE WITNESS: Yes.

21           THE COURT: Thank you. I just want to  
22           remind you again, don't talk to anyone about the  
23           case or let anyone talk to you about the case.  
24           Don't receive or send electronic messages about the  
25           case, and avoid outside information or any other

1 sources of information about the case. All right?

2 Have a great break. We will see you at 1:30.

3 (Jury exits courtroom.)

4 THE COURT: Does the government have  
5 anything?

6 MS. MARTIN: Your Honor, there was one  
7 exhibit, the audio, 113, and I wasn't sure if, when  
8 I read off the list, I think I included it, but I  
9 wanted to make sure that one was admitted. It was  
10 in the list that was --

11 THE COURT: No, because you did 114 to  
12 312. I don't have 113 here anywhere. So do you  
13 want to offer 113.

14 MS. MARTIN: Yes, Your Honor, I would  
15 offer 113.

16 THE COURT: Any objection?

17 MR. WHALEN: No, Your Honor.

18 THE COURT: 113 is admitted.

19 MS. MARTIN: Thank you, Your Honor.

20 THE COURT: Mr. Whalen?

21 MR. WHALEN: Just real briefly. Do you  
22 have an estimate when you will take the afternoon  
23 break?

24 THE COURT: I don't know yet.

25 MR. WHALEN: We will have one?

1 THE COURT: Yes, 15 minutes. And we --  
2 there's a little newspaper article that came out  
3 last night. I don't think it's too important. I do  
4 want to make you aware of it, and maybe I will talk  
5 to the jury about it. It's just minor, but I just  
6 wanted to let you know. Okay?

7 MR. WHALEN: And I was aware of it, and I  
8 did have the thought of -- and now that you mention  
9 it -- whether you wanted to inquire whether or not  
10 anybody reviewed it or looked at it.

11 THE COURT: I think I will just tell them  
12 not to read anything before I get into that. We  
13 will talk to them about it.

14 MR. WHALEN: Okay. Thank you, Your Honor.

15 THE COURT: Anything else?

16 MS. MARTIN: No, Your Honor.

17 THE COURT: See you at 1:25.

18 (Recess taken.)

19 THE COURT: Both sides ready for the jury?

20 MR. WHALEN: Yes, Your Honor.

21 MS. MARTIN: Yes.

22 THE COURT: Okay, let's bring them in.

23 (Jury enters the courtroom.)

24 THE COURT: Ms. Meeks, if you will  
25 continue with your direct examination of this

1 witness.

2 MS. MEEKS: Thank you, Your Honor.

3 Q. (By Ms. Meeks) Dr. Vidino, will you please  
4 turn to Government's Exhibit 124 in your transcript  
5 binder, with the corresponding audio of 123. And  
6 the date on Exhibit 124 is October 8th, 2016, with  
7 participants Said Rahim, the defendant, and a  
8 participant by the initials of KK.

9 Starting from line 7, with the user KK saying:

10 "Our brother, Angousha, greeting from God. I  
11 mean, I am trying I mean...we met with...I met with  
12 the Media Committee and we met with the Coordination  
13 Committee and what is left is the Discussion  
14 Committee. I sent to the Discussion Committee, but  
15 not all of them got on; Ibn Dawla got on and  
16 Abu-'Uday also got on, and you were the third one.  
17 So I need to meet with them, but they did not get  
18 on. To get over with the matter of the meeting and  
19 determine the thing."

20 To which the defendant replied:

21 "There are two right now, Peace be upon you and  
22 greetings from God. I swear I am here and present.  
23 You just sent me the invitation and you just told  
24 me, because I was driving the car, I mean I did not  
25 pay attention. But I looked ten minutes ago and

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1 there was no invitation. Though I mean I got the  
2 one that you have sent me er, the password, that you  
3 had mentioned. Greetings from God. All right, is  
4 any of them available on the channel? Those  
5 individuals. Those are...who are they? Ibn Dawla,  
6 Abu-'Uday and and who else? Er, al-Hadrami? Who  
7 are they, can you name them for me, if you please."

8 So in this section here, they are discussing  
9 the committees on the channels. What does that mean  
10 to you?

11 A. It shows a level of sophistication and  
12 structure within the channel, meaning that there are  
13 multiple individuals that organize in committee to  
14 organize certain parts of the channel's inner  
15 workings, and clearly the defendant is part of that  
16 organizing team.

17 Q. And let me now, if you don't mind, direct you  
18 to Government's Exhibit 142. 142, with the  
19 corresponding audio exhibit of 141. The date is  
20 October 9th, 2016. The participants are an unknown  
21 mail, Said Rahim, the defendant, and Ibn Dawla.  
22 Starting with Ibn Dawla:

23 "Peace upon you with the mercy blessings of  
24 God."

25 And the unknown male:

1 "Peace upon you so with the mercy and blessings  
2 of God. Praise be to God, it's emerging. The  
3 Dialogue Committee emerged, and they all came out.  
4 May God help us! All right, our brothers in the  
5 Dialogue Committee, we talked in the matter of a  
6 dialogue committee whose official Emir is Angousha,  
7 who designates, who er, carries the dialogue based  
8 on jurisprudence and reality er, the Levant people  
9 to the Levantines, er, the Yemenis people to the  
10 Yemenis people, the Pen- --"

11 THE COURT: Hold on a second. Did you get  
12 that?

13 Start again.

14 MS. MEEKS: Come up to line 10:

15 "Peace upon you so with the mercy and  
16 blessings of God. Praise be to God, it's emerging.  
17 The Dialogue Committee emerged, and they all came  
18 out. May God help us! All right, our brothers in  
19 the Dialogue Committee, we talked in the matter of a  
20 dialogue committee whose official Emir is Angousha."

21 Let me actually stop there for now.

22 What does it -- again, what does it mean by,  
23 "whose official Emir is Angousha"?

24 A. Means the official leader, chief.

25 THE COURT: And that is spelled how?

1 MS. MEEKS: E-M-I-R, Your Honor.

2 THE COURT: Okay. All right.

3 Q. (By Ms. Meeks) And who do you know Angousha to  
4 be?

5 A. The defendant.

6 THE COURT: And that's spelled -- trying  
7 to get it for her.

8 MS. MEEKS: A-N-G-O-U-S-H-A.

9 THE COURT: Okay.

10 Q. (By Ms. Meeks) And then it continues:

11 "The official Emir is Angousha, who designates  
12 who carries the dialogue based on jurisprudence."

13 Dr. Vidino, what does that mean?

14 A. That's an important part. As we said this  
15 morning. Everything ISIS does and ISIS supporters  
16 do is based on law, or at least what they believe to  
17 be the correct interpretation of law. Everything  
18 needs to be sanctioned under Shari'a, under Islamic  
19 law. So here it basically says that Angousha  
20 carries the dialogue based on jurisprudence, which  
21 means that he has that knowledge, or at least the  
22 other people believe him to have the knowledge on  
23 Islamic law, which would make him the Emir, would  
24 make him somebody definitely above the others.

25 Q. Then it continues on line 18:

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1 "The Levant people to the Levantines, the  
2 Yemenis people to the Yemenis people, the Peninsula  
3 people to the Peninsula people, and Iraqi people to  
4 the Iraqi people, and so on. So, he assigns them."

5 Can you explain to us what the Levant people  
6 and the Levantines, what those mean?

7 A. Basically they are dividing different people  
8 according to sort of the dialects, the region within  
9 the Arabic world and the dialects they speak. So  
10 the Levant people to the Levantines, so the people  
11 from Levant, Syria, Jordan, Palestine and Lebanon  
12 would speak, because they speak a similar dialect,  
13 they would be speaking to one another. The Yemenis,  
14 that's another region of the dialect. The Peninsula  
15 people means the people from the Arabian peninsula,  
16 so Saudi Arabia, Kuwait, the United Arab Emirates,  
17 so different parts of the Arabic world.

18 THE COURT: Will you spell Levant?

19 MS. MEEKS: Yes, Your Honor. It's  
20 L-E-V-A-N-T.

21 THE COURT: Thank you. Just like it  
22 sounds.

23 Q. (By Ms. Meeks) Dr. Vidino, you were saying?

24 A. It's a geographical division. So it seems that  
25 the committee, the leadership of the group to which

1 the defendant definitely belongs, is dividing the  
2 different people who frequent the channel based on  
3 the region where they come from in the Arabic world  
4 and based on the dialect they speak.

5 Q. Okay. And then continuing on line 23:

6 "The quick things will be discussed by those  
7 who know the Shari'a matters, this means that do not  
8 interfere in other committees. The Coordination  
9 Committee is for coordination, so the Dialogue  
10 Committee will not interfere with the Coordination  
11 Committee, whether in muting, blocking, confirmation  
12 or otherwise, unless there is no one present, then  
13 all committees can interfere with each other. That  
14 is in case nobody is available. These are just the  
15 points and to be patient as we told our brother  
16 al-Raqam al-Sa'b to be patient with the speaker and  
17 also our brother Ibn Dawla. We have to be patient  
18 and not to utter bad words and such, since this will  
19 weaken our cause, although we have a strong cause,  
20 praise be to God."

21 On line 13, the defendant Said Rahim says:

22 "And peace be upon you. God willing, I will  
23 speak in a little while because I am a little busy  
24 right now. I mean just a little while, because, God  
25 willing, I have a word to say. I mean, I was

1 supposed to be speak after Abu-Hamzah, but God  
2 willing, the other person is listening."

3 With regard to the structure of the channel, is  
4 this a sophisticated structure in terms of what you  
5 have seen?

6 A. Yeah, in comparative terms I would say so. The  
7 majority of channels one would see on other  
8 platforms would not have this division, the  
9 committees would be very horizontal. Of course you  
10 might have some personalities who will emerge,  
11 people who will post more frequently or be more  
12 charismatic will emerge, but it will be more  
13 democratic, more horizontal. Here there's really a  
14 formalized structure. It's somewhat different and  
15 more elaborate.

16 Q. And does that demonstrate to you that the  
17 channel is organized in such a way to have a  
18 purpose?

19 A. Yes, I would say so.

20 Q. Is that consistent with what you have seen  
21 elsewhere?

22 A. Yes. Generally the more sophisticated ones  
23 tend to be the more operational.

24 Q. Please turn to Government's Exhibit 174 with  
25 the corresponding audio exhibit of 173. The date on

1 this is December 30th, 2015, and the participant is  
2 Said Rahim. I will direct you to line 23 on the  
3 first page:

4 "We see who from those are I mean following the  
5 right path, and I mean violations...I can give you  
6 the Shari'a language regarding the religious  
7 fallacies that Hamas fell into and that the brothers  
8 fell into. I mean this is Shari'a talk and not an  
9 opinion. I asked the question, meaning Hamas has  
10 this thorn in Gaza, then why doesn't Hamas implement  
11 the God's Shari'a, what's preventing it?"

12 Let's back up to the first part where it talks  
13 about the Shari'a language and the religious  
14 fallacies of Hamas. Can you interpret that for us?

15 A. Yes. Basically Hamas is another group that I  
16 would say is Islamist, meaning that it adopts a very  
17 politicized and extreme version of Islam for  
18 political purposes, sort of like ISIS and al-Qaeda.  
19 But Hamas is criticized by groups like ISIS as being  
20 too soft, too compromising. I mean, it's all  
21 relative. It's still a group that is a designated  
22 terrorist organization. But it is criticized by  
23 al-Qaeda and by ISIS as being too engaged in  
24 politics, too compromising and not just devoted to  
25 outright violence as ISIS is.

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1 And the language here seems to say that the  
2 defendant can give the Shari'a language -- so,  
3 again, everything needs to be interpreted through  
4 Shari'a, through Islamic law. The defendant has the  
5 ruling, Islamic-based ruling as to why Hamas is not  
6 a legitimate group, why Hamas has swayed from the  
7 right path.

8 Q. And the same exhibit, Government 174, please  
9 turn to page 3, starting on line 13. Again, this is  
10 the defendant stating:

11 "Then why doesn't Hamas take advantage of the  
12 state of humiliation and misery that God has  
13 disgraced them with eternally? Why doesn't Hamas  
14 take advantage of it? Why don't they take advantage  
15 of it? But Hamas takes everybody into account. And  
16 I used to be from Hamas, I used to be Hamas, but I  
17 had enough of it and denounced it. 'Denounce the  
18 Tyrannical rulers as your Gods and kill all the  
19 countrymen and direct your heart to the only  
20 worshiped God.' That's it. I was done with Hamas.  
21 I was Hamas, I used to defend it, but praise be to  
22 God, the Lord of the Worlds, I became aware of the  
23 Islamic nullifications, I got to know the rules of  
24 there is no god but Allah, the One and Only."

25 We will stop there. Can you explain to us, the



1 first part of that paragraph we discussed, what does  
2 it mean, "Why doesn't Hamas take advantage of the  
3 state of humiliation and misery"? What is he  
4 getting at there, or what do you interpret that to  
5 be?

6 A. It's fairly common criticism that is leveraged  
7 by members of ISIS and other groups against Hamas as  
8 to Hamas being, A, too soft and compromising against  
9 Israel; and B, not implementing Shari'a law fully in  
10 the territory controls, which is the Gaza Strip. So  
11 basically Hamas, according to this interpretation  
12 has gone astray; it's not hard enough, it doesn't  
13 follow the right path. It's Islamically -- what  
14 it's doing is not Islamically justified; it  
15 compromises too much.

16 Q. What does it mean to, "I used to be from Hamas,  
17 I used to be Hamas. I had enough of it and  
18 denounced it"?

19 A. I either used to be from Hamas or at least I  
20 used to be a supporter of Hamas, but I am  
21 disenchanted of what I've seen of the way Hamas  
22 operates, and so I denounced it. And there's,  
23 again, a religiously-based justification as to why  
24 Hamas is not legitimate and the Islamic State is.

25 Q. So what does this tell you about the defendant

1 by stating this?

2 A. That he has moved from Hamas, to being a  
3 supporter of the Islamic State of ISIS.

4 Q. Please turn to Government's Exhibit 182 now;  
5 182, with the corresponding audio Government  
6 Exhibit 181. 182 it is dated July 15, 2016, and the  
7 only participant is Said Rahim. Please turn to page  
8 12 of Government Exhibit 182.

9 Starting on line 2 on page 12, the defendant  
10 says:

11 "I advise you to think and pull your army, pull  
12 your army from the region of the Muslims and that is  
13 it, and you pay the jizyah."

14 Am I saying that right?

15 THE COURT: Spell that, please.

16 MS. MEEKS: It's J-I-Z-Y-A-H, Your Honor.

17 Q. (By Ms. Meeks) What does that mean?

18 A. Jizyah is the tax that non-Muslims are --  
19 special tax that non-Muslims are supposed to pay to  
20 the Islamic State, to the Islamic ruler; it applies  
21 only to non-Muslims.

22 Q. How does that fit within the frame of ISIS in  
23 terms of ruling on a non-Muslim state?

24 A. That's the way ISIS would apply it. So people  
25 who are non-Muslims are given three choices,

1 basically. ISIS has made the case repeatedly, has  
2 published countless literature about it, gives you  
3 three choices: You either convert to Islam; you pay  
4 the jizyah, special tax; or you get killed. That's  
5 one of the three.

6 Q. It continues on line 5:

7 "I mean as I said, which is the best solution,  
8 for is there no other choice, there is no other  
9 choice, there is no other choice. Nobody is going  
10 to negotiate with you. Nobody is going to negotiate  
11 with you. The State of the Caliphate is not going  
12 to send anyone to negotiate with you. No, no, no,  
13 there won't be. This will happen with the Muslim  
14 brotherhood and Hamas, but not with the State of the  
15 Caliphate. We negotiate with you with the sword,  
16 the booby trap and the truck."

17 What does this mean to you?

18 A. It's, again, the criticism -- the debate that  
19 exists within the Islamist movement; again, within  
20 groups that use Islam for political purposes. But  
21 you have two currents. One is what I would call the  
22 jihadist current, groups like ISIS and al-Qaeda,  
23 that don't believe in any kind of negotiation, any  
24 kind of politics, it's just violence and what they  
25 would call jihad.

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1 And then you have groups like Hamas, like the  
2 Muslim brotherhood, that are still very extreme in  
3 their world view, but do adopt a mix of violence, of  
4 terrorism, but at the same time of politics. So  
5 they run for elections. They will still use  
6 terrorism as they run for elections, the Hamas do.

7 Here it seems very clear that the defendant  
8 finds that hybrid approach used by Hamas is not  
9 acceptable, not Islamic and that the only one  
10 acceptable is the no negotiations. There's a very  
11 famous way of putting it, which is bullets over  
12 ballots, meaning only fighting is the right way to  
13 achieve the goal, no negotiations, no dialogue.

14 Q. Okay.

15 MS. MEEKS: Your Honor, at this time I  
16 would request to publish a demonstrative exhibit.  
17 It's a map that defense has seen.

18 THE COURT: Do you have an exhibit number?

19 MS. MEEKS: It's a demonstrative aid. I'm  
20 sorry, Your Honor.

21 THE COURT: All right. Any objection?

22 MR. WHALEN: No, Your Honor.

23 THE COURT: All right.

24 Q. (By Ms. Meeks) We're going to be talking --  
25 and we have talked a lot about terrorist attacks in

1 Nice, France and Orlando, Florida and Istanbul,  
2 Turkey. I thought it would be helpful for the jury  
3 to get a geographic view of this.

4 Can you sort of point out for the jury,  
5 starting at the top, where these locations are?

6 A. Start with the U.S.?

7 Q. Yes, sure.

8 A. So we have Dallas -- I don't think I need to  
9 point it. We have Dallas, Texas. And then we have  
10 Orlando, Florida. That's where the June 2016 attack  
11 against the Pulse Nightclub took place. Then we  
12 move to Europe, Nice, France, that's where the  
13 July 14th, 2015 -- '16, I'm sorry, attack took  
14 place. And then moving further east, Istanbul,  
15 Turkey, January 1st, 2017, New Year's Eve attack  
16 against the Reina Nightclub in Istanbul.

17 Q. Okay. Let's start, if we can pull up the map  
18 of Nice, France.

19 Are you familiar with the attack that occurred  
20 in Nice, France, as I think you said you are?

21 A. I am.

22 Q. And where did that occur?

23 A. So what's the Promenade Des Anglais, sort of  
24 the big boulevard right on the sea, very famous  
25 boulevard, very trendy, where all the restaurants

1 are in Nice.

2 So on the evening of July 14th, which is the  
3 Bastille Day, it's a French national day, big  
4 celebration in France, there were fireworks taking  
5 place. And a truck driven by an ISIS supporter  
6 drove through what was supposed to be a pedestrian  
7 only area and mowed down everybody on the boulevard.

8 Q. How many deaths did that result in?

9 A. Eighty-seven.

10 Q. Do you know how many people were injured?

11 A. In the hundreds. I forget the exact number.

12 Q. Did ISIS claim responsibility for that attack?

13 A. ISIS did claim responsibility for that.

14 Q. Can you please turn to Government's Exhibit  
15 170.

16 I'm specifically starting on page 2. 170 is  
17 dated July 15th, 2016. And the participants are  
18 Said Rahim, the defendant, and an unknown male.

19 Just as a reminder, Dr. Vidino, when did the  
20 Nice attack occur?

21 A. July 14th.

22 Q. Fourteenth. So the day before?

23 A. Yes.

24 Q. Start on page 2, on line 11, where the unknown  
25 male says:

1 "This is not going to be the last operation.  
2 All this is on the shoulders of the wicked French  
3 president. If they refrain from hurting the  
4 Muslims, the Muslims will refrain from hurting them.  
5 And there is no jizyah between them and us now, but  
6 blood is between us, between them and us is  
7 vengeance, between them and us is blood, more like  
8 valleys of blood."

9 Again, how does this fit within the concept of  
10 ISIS desired control over a non-Muslim area?

11 A. That is exactly reflecting the mindset that  
12 ISIS has been expressing and formulating for a long  
13 time. Basically he's saying that there is no jizyah  
14 agreement between the Islamic State and France, so  
15 the French are not paying this special tax that the  
16 non-Muslims are supposed to pay to the Islamic  
17 State; therefore, the alternative is blood. They  
18 are non-Muslims, they haven't converted to Islam,  
19 they are not paying the tax. The alternative is  
20 blood, so valleys of blood, as he put it -- as he  
21 puts it.

22 Q. Can you turn to the next page, page 3? And  
23 this is, as you can see, the defendant talking in  
24 this section here, starting on line 18:

25 "This is what al-'Adnani said, if you recall.

1 Al-'Adnani when he said something to the effect that  
2 the nonbeliever will turn, he will turn towards the  
3 right, to the right and the left in fear, and this  
4 is what is happening. Oh man, now the French and  
5 all the Europeans are in extreme state of terror.  
6 Everybody is living in fear. Are they going to  
7 prevent everyone from driving trucks? Then go ahead  
8 and stop, stop them from driving trucks. Praise be  
9 to God, the Lord of the worlds. I was really happy  
10 for this act, I was happy for this act, those dogs."

11 Is he talking about the attack that occurred  
12 the day before?

13 A. Yes. And he's referencing France, the fact  
14 that the French people and the Europeans in general  
15 are living in fear. That is very much the rhetoric  
16 of al-'Adnani whose message said, fear their  
17 neighbor, that was really the main theme.

18 And then the idea of driving trucks, that's how  
19 the attack took place in Nice. He's also  
20 referencing the concept that by using weapons, which  
21 are not really weapons, are tools that everybody has  
22 access to on a daily basis, a car, a truck in this  
23 specific case, makes it almost impossible for law  
24 enforcement to stop those acts. And it's what  
25 'Adnani, the number two in ISIS, had called for, use



1 any kind of weapon -- any kind of tool as a weapon.

2 Q. And how is that fear helpful to ISIS?

3 A. It helps, as we said this morning, in different  
4 ways. It helps because it makes potentially  
5 Governments change their policy and withdraw from  
6 attack from the coalition and withdraw from  
7 attacking ISIS; it's a fear that brings polarization  
8 in society. What ISIS wants is really a divide of  
9 an us versus them mentality in the West between  
10 Muslims and non-Muslims in which non-Muslims will  
11 see Muslims as all terrorists and all dangerous.  
12 And Muslims, in reaction, will see all non-Muslims  
13 as against them. This generalized fear that these  
14 kinds of attacks bring about is exactly what ISIS  
15 aims to achieve.

16 Q. Okay. Next page, on page four, starting on  
17 line 5, which is again often the defendant:

18 "Praise be to God, the Lord of the worlds,  
19 al-'Adnani's words, may God preserve him, were  
20 fruitful. I mean from the early days when he said,  
21 'Do not ask anyone for fatwa and do not consult with  
22 anyone, kill them in any way possible, kill them in  
23 any way possible.' So Praise be to God, the Lord of  
24 the Worlds, this Muslim monotheist did not consult  
25 anyone. He did not call al-Qardawi --" is that how

1 you say that "--

2 A. Yes.

3 Q. "-- and tell him, well, al-Qardawi, I want to  
4 do such and such. No, no, no, he did not do that,  
5 and that's it. He took the fatwa from the trusted  
6 ones, the scholars, the trusted scholars, the  
7 frontier scholars, like the jihadist scholar  
8 al-'Adnani."

9 Is he talking again about the attack on France?

10 A. Yes. And he's explaining how that fits into  
11 what 'Adnani, ISIS leader 'Adnani had called for,  
12 which is do it yourself, jihad. You don't need to  
13 be part of the group. You don't need to get some  
14 special decree or authorization from some scholar,  
15 just do it. You have the general blessing from ISIS  
16 that's sort of a polemical attack against some of  
17 the more mainstream clerics in Islam, the scholars  
18 of jihad, people like 'Adnani. So scholars that  
19 belong to ISIS are the ones that give authorization  
20 to carry out attacks indiscriminately everywhere,  
21 and those are the only people you should listen to.  
22 There's no point in asking for opinions, so on and  
23 so forth, just carry out the attacks.

24 Q. Can we turn to Government's Exhibit 226, with  
25 corresponding audio 225. Turning to page 3 of 226

1 dated July 19th, 2016 and the participant is Said  
2 Rahim, the defendant, starting on line 12, saying:

3 "Now there are people, lone wolves, that think  
4 about operations that will affect the biggest or the  
5 largest number possible of those. How much did this  
6 one, the one who used the truck earlier... Oh man,  
7 he killed a lot. I swear that he killed many, I  
8 mean, er, I mean the success of this operation was  
9 better than a nuclear bomb...that act that he  
10 carried. We will wait and see."

11 What is he talking about, "the biggest or  
12 largest number possible"?

13 A. He's praising the effectiveness of the action  
14 of the attacker in Nice, just one person, no  
15 organization, no operational backing. One person  
16 rents a truck, cheap operation, yet he kills 87  
17 people; very powerful operation.

18 MS. MEEKS: Your Honor, permission to post  
19 a demonstrative aid?

20 THE COURT: Fine. Mr. Whalen, do you know  
21 what it is?

22 MR. WHALEN: Yes, I do, Your Honor. I  
23 have no objection.

24 Q. (By Ms. Meeks) This is a map here, Dr. Vidino.  
25 Can you describe what we're looking at here?

1 A. That's Europe and parts of the Middle East, and  
2 the focus is on Istanbul, the largest city in  
3 Turkey.

4 Q. Are you familiar with a terrorist attack that  
5 occurred in Istanbul on January 1st, 2017?

6 A. Yes, I am.

7 Q. Can you tell us about that?

8 A. One known member of ISIS entered a nightclub  
9 where people were celebrating New Year's Eve. He  
10 killed the security guard at the front door. And  
11 armed with automatic weapons, went and -- dressed as  
12 Santa Claus, went inside and killed almost 40  
13 people.

14 THE COURT: 40 or 14?

15 THE WITNESS: 40; four, zero.

16 THE COURT: Okay.

17 A. And then he left the site; was not killed in  
18 the operation and left the site and was later  
19 arrested.

20 Q. (By Ms. Meeks) How many people were injured,  
21 do you know?

22 A. Less than a hundred if I am correct.

23 Q. And did ISIS claim responsibility for that  
24 attack?

25 A. It did.

1 Q. Can you please turn to Government's Exhibit  
2 176? Government's Exhibit 176, the corresponding  
3 audio 175. The date on this is December 16th, 2016,  
4 and the participant is Said Rahim, the defendant.  
5 Starting on line 6:

6 "May God prolong your lives. Yes, now, now the  
7 brothers in Syria, I mean those that are now present  
8 in Turkey, God willing --"

9 THE COURT: Who did you say the speaker  
10 was?

11 MS. MEEKS: It's the defendant, Your  
12 Honor.

13 THE COURT: Okay.

14 Q. (By Ms. Meeks) "Those that are now present in  
15 Turkey, God willing now, they must...that's it,  
16 pledge allegiance to the Islamic State and be lone  
17 wolves and attack the Turkish government, its  
18 individuals, its constituents, its police, its  
19 quarters, its banks, its tourist sites, its vessels,  
20 its nightclubs, and everything. Let everything that  
21 pertains to Turkey become a target for you.  
22 Meaning, fend off on behalf of your jihadist  
23 brothers. They want to make your brothers in Syria  
24 victorious, and some have fled to Turkey. Fine,  
25 make penance for your misdeeds by fleeing to Turkey,

1 make penance, maybe God then will forgive your  
2 misdeed and I mean cleanse your sin. Attack the  
3 army of unbelief in Turkey, attack it. Don't be  
4 among those that stand in queue waiting for a bread  
5 handout, the queue of disgrace, but be in the  
6 martyrs' queue, the ones who I mean...be in the  
7 martyrs' queue of those who are standing at the  
8 doors of paradise, awaiting the opening of the doors  
9 so they can go in from any door they like."

10 We will stop at this section.

11 Dr. Vidino, what is he calling for here?

12 A. He's openly calling for attacks against Turkey.  
13 He's calling for the kind of attacks that 'Adnani  
14 has outlined, so against any possible target, sort  
15 of anything works from, you know, soft targets, like  
16 nightclubs, tourist sites to police and so on and so  
17 forth, so basically any kind of target.

18 He's particularly trying to reach out to people  
19 who might live in Turkey as refugees. The part  
20 where it talks about people are fleeing to Turkey,  
21 there's a queue waiting for a bread handout, it's  
22 probably a reference to refugees, Syrian refugees  
23 who live in Turkey. And what he is saying is, is  
24 don't be there like a begger, but strike Turkey as  
25 revenge for what Turkey did against the Islamic

1 State, but also to turn Turkey into a part of the  
2 Caliphate.

3 Q. And does the date have any significance to you?

4 A. It's two weeks before the attacks in Istanbul.

5 Q. Can I ask you to turn to Government's Exhibit  
6 166.

7 Can you please, instead, turn to Government's  
8 Exhibit 192; 192 first. 192, with the corresponding  
9 audio of 191. The date for Government's Exhibit 192  
10 is January 3rd, 2017. The participants are Said  
11 Rahim, the defendant, and an unknown male.

12 Starting on line 7, the defendant says:

13 "May God bless you. Praise be to God, the Lord  
14 of the Worlds. No, we will see now what the news  
15 is. There is a statement; I do not know if you saw  
16 the statement, I mean there is an official statement  
17 that I read yesterday where the Islamic State claims  
18 responsibility for the club, this nightclub in  
19 Istanbul. Praise be to God, the Lord of the Worlds.  
20 I mean, this is the beginning."

21 What's he talking about here?

22 A. About the communique ISIS issued two days after  
23 the attack in Istanbul.

24 Q. And that's the attack we were just talking  
25 about?

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1 A. I'm sorry?

2 Q. That's the attack you were just talking about?

3 A. Yes. ISIS, as it normally does, it issues a  
4 communicate a day, a couple of days after the attack,  
5 claiming responsibility.

6 Q. Can you then turn to page 2 of the same  
7 exhibit, Government's Exhibit 192, starting at line  
8 11. This is the defendant:

9 "Also, if you recall, before from...I mean less  
10 than a month -- less than a month, I called upon the  
11 brothers, I mean, to target Turkey. But I...who am  
12 I to be heard, but I mean, praise be to God, the  
13 Lord of the Worlds. I ask God to grant me reward  
14 for it, for inciting brothers to perform jihad for  
15 the cause of God, for inciting brothers to perform  
16 jihad for the cause of God and to fight the enemies  
17 of Almighty God."

18 What does this mean to you?

19 A. There's some degree -- in the first part he  
20 takes some responsibility for having called for the  
21 attack. The fact that, "less than a month, I called  
22 upon the brothers to target Turkey," then he sort of  
23 had this moment of humility, if you will, like, "Who  
24 am I to be heard?" And at the same time, one line  
25 after that, it says, "I ask God to grant me a



1 reward." So I did something right. I called for  
2 attacks in Turkey, the attacks took place, and I  
3 asked God to reward me for that.

4 Q. And can you turn now to Government's Exhibit  
5 166. It's got the corresponding audio of 165, Your  
6 Honor, and the date on this January 2nd, 2017. The  
7 participant is Said Rahim, the defendant.

8 And, Dr. Vidino, is this date significant to  
9 you?

10 A. What part?

11 Q. The date?

12 A. The date, the day -- it's the day after the  
13 attack.

14 Q. I'm starting at line 27 on page 1. The  
15 defendant saying:

16 "in continuation of the blessed operations  
17 waged by the Islamic State against the protector of  
18 the cross, Turkey, one of the Caliphate hero  
19 soldiers demolished one of the most famous  
20 nightclubs where Christians hold their polytheistic  
21 celebrations. He attacked them with hand grenades  
22 and his machine gun, exchanging their joys for  
23 sorrows, reaping a hundred fifty people dead and  
24 wounded, in revenge for Almighty God's religion, and  
25 at the behest of the true believers' Emir, to target

1 the protector and servant of the cross: Turkey."

2 What does he mean, "servant of the cross:  
3 Turkey"?

4 A. It's the accusation that ISIS may have cut  
5 Turkey off being in cahoots with Christian  
6 countries. Turkey is a member of NATO. It has  
7 political alliance and military alliances with the  
8 United States and Western countries; therefore, it's  
9 seen by ISIS and ISIS supporters as a traitor, as a  
10 Muslim country, because it is a Muslim majority  
11 country, that sides with Christians against Muslims.

12 Q. And what does this mean, "the polytheistic  
13 celebrations"?

14 A. The attack took place on New Year's Eve. That  
15 obviously, from a strictly Islamic point of view, is  
16 not an Islamic holiday. And so what people were  
17 doing there is celebrating something non-Muslim in a  
18 Muslim land. The majority of people actually killed  
19 in the nightclub were mostly Muslims.

20 Q. Please turn to page 7 of the same exhibit.

21 This is the defendant speaking, starting on  
22 line 10 on page 7:

23 "That is it. As al-'Adnani said: "Kill them  
24 and do not ask for anyone's fatwa. Kill them and do  
25 not seek a fatwa from anyone. This one killed them.

1 He killed them, spilled their filthy blood and  
2 offered his soul. I do not know, I mean we ask God  
3 to accept him if he was martyred."

4 And then a few lines down, on line 23:

5 "Yes, honorable brothers, those...this is the  
6 nature of these jihadists who Almighty God enabled  
7 and they attacked those; they attacked and devoured  
8 them, and viciously devoured them. This is our  
9 terrorism, it extends -- our terrorism extends and  
10 the State is strong, by the grace of God, glorified  
11 and exalted be He. 'This is terror: Terrorism  
12 reaches Turkey.' Yes, our terrorism as decreed by  
13 God, glorified and exalted be He, it is to terrorize  
14 you, to kill you and to spill your blood, seeking  
15 closeness to God, glorified and exalted be He.  
16 Servant of the cross, Erdogan, take note that the  
17 Caliphate will not leave you alone, you started, and  
18 we will finish the war with you, God willing."

19 Remind us who Erdogan is?

20 A. The president of Turkey.

21 Q. What is he saying here?

22 A. It's pretty open, as open as it gets; basically  
23 saying that Turkey needs to be punished, but this  
24 is -- what's striking is that he clearly identifies  
25 with ISIS as our terrorism, our -- that basically

1 Turkey, by virtue of its foreign policy, its  
2 positions, is a target, and he keeps praising the  
3 attack as, "our terrorism."

4 MS. MEEKS: Your Honor, permission to  
5 publish a demonstrative aid? The defense has seen  
6 this.

7 THE COURT: Any objection?

8 MR. WHALEN: No, Your Honor.

9 THE COURT: All right.

10 Q. (By Ms. Meeks) Dr. Vidino, can you just tell  
11 us what we are looking at here?

12 A. A map of Orlando, Florida. And that is the  
13 Pulse Nightclub, where the attack of June 2016 took  
14 place.

15 Q. Okay. Can you pull the microphone a little  
16 closer to you?

17 A. Yes.

18 Q. Are you familiar with the terrorist attack that  
19 occurred on June 12th, 2016 --

20 A. Yes.

21 Q. -- in Orlando, Florida?

22 Can you describe that attack, please?

23 A. Yeah. What happened is that an individual  
24 named Omar Mateen entered the nightclub when it was  
25 full with people. And with automatic weapons, he

1 started shooting pretty much the same model that we  
2 saw in Istanbul and killed people for basically  
3 three hours; made a phone call after having killed a  
4 few people to the local police department, the local  
5 dispatch, saying that he was doing that on behalf of  
6 the Islamic State.

7 Q. Do you know how many people ended up dying?

8 A. Around 40.

9 Q. How many were injured?

10 A. Less than a hundred, if I'm not mistaken.

11 Q. Can you please next turn to Government Exhibit  
12 178; 178, with the corresponding audio exhibit of  
13 177. The date on Government's Exhibit 178 is  
14 June 13th, 2016, and the participant is Said Rahim,  
15 the defendant, and another participant with the  
16 letters Asd1999135.

17 Dr. Vidino, is this date of June 13th  
18 significant to you?

19 A. The day after the attack in Orlando.

20 Q. Okay. Please look at, starting at line 18, the  
21 defendant speaking:

22 "There are news state that an attack in the  
23 state of...in Orlando, Florida State. The city of  
24 Orlando is a touristic city. The news state that an  
25 attack led to killing 50 Americans. This is the

1 initial news. I mean, God willing, we will follow  
2 up with the news and pass it on to you as it comes.  
3 I mean, you remember what al-'Adnani said, may God  
4 protect him."

5 And then if you will turn to the second page,  
6 line 18; again, the defendant:

7 "Glory be to God, this is the lion and these  
8 are the lions. Glory be to God. This city, I mean,  
9 it brings America, I mean, a bunch of money, and it  
10 is a tourist city, and it is all tourism. It has  
11 the city of Orlando, an entertainment city, this  
12 city. I mean it is a strong vein, this city, so  
13 glory be to God. We have to follow up on the  
14 consequences of this subject."

15 Why would he mention it being a tourism city?

16 A. He's trying to contextualize the attack in  
17 explaining to maybe people who are less knowledgable  
18 about America that Orlando is a very famous tourist  
19 destination and that carrying out an attack is a  
20 consequence of the economy.

21 It's one of the reasons why groups like ISIS  
22 carry out terrorist attacks in certain locations is  
23 also to damage the economy. The attacks of 911  
24 caused a major damage to the tourism industry in New  
25 York. Doing something in Orlando, a tourist

1 destination, might cause the same sort of damage  
2 from an economical point of view.

3 Q. Please turn to page 3 of the same exhibit,  
4 starting on line 19. Again, this is the defendant:

5 "I swear by God, this attack shook them  
6 violently. Pictures of the attacker here. There is  
7 a picture of the guy who did it. Glory be to  
8 Almighty God. Blessed be to Almighty God. Now  
9 starts the outreach activity at all the mosques,  
10 especially in America, to publicize, to publicize  
11 this operation, hey, oh boy, yet praise be to God."

12 Why is publicity important?

13 A. ISIS recruits. They need recruits. It's all  
14 about propaganda. It's all about attracting new  
15 members and new sympathizers. So here what the  
16 defendant is saying is the next step is to do  
17 outreach to all mosques and explain what happened,  
18 explain that ISIS carried out the attack in order to  
19 attract sympathy and to attract recruits.

20 Q. Can you turn to page 4? Starting on line 7;  
21 again, the defendant:

22 "I mean, this is a message we send to the  
23 agents of the Intelligence at the FBI and CIA, I  
24 mean, to tell their bosses. Enough America, stop  
25 and remove your tarnished hands from Muslims.

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1 Enough, pull back and do not interfere."

2 What does he mean there?

3 A. It's another common theme in ISIS propaganda.  
4 The idea that ISIS carries out the attacks and sends  
5 a message to America, American leaders, to stay away  
6 from the Middle East. In this specific case, of  
7 course, ISIS is under attack by the United  
8 States-led coalition. And the idea is, we bring  
9 terrorism to your homeland because you are attacking  
10 us is Syria and Iraq.

11 Q. Can we please turn to page 5, and I will point  
12 you to line 24, same exhibit, and it's the  
13 defendant:

14 "I mean, what makes it easy er living in  
15 America and the United States to execute these  
16 operations...is, of course, first and foremost, and  
17 always and ever, God's facilitation and  
18 conciliation. I mean, this goes without saying or  
19 discussion. But the nature of America and the  
20 nature of the United States, it is easy for someone  
21 to get weapons. To acquire a weapon is very, very,  
22 very easy. Just about any person can have a weapon.  
23 I mean, most everyone is armed, everyone is armed.  
24 I mean they would have weapons. I mean it is not  
25 hard to get a weapon. You can be...go anywhere



1 carrying a weapon. You can go the airport carrying  
2 weapons because, for example, no one inspects or  
3 anything."

4 And it continues:

5 "There is no inspection, and the clubs,  
6 restaurants, anywhere, no weapons are there, weapons  
7 are not present. These are I mean the elements,  
8 which I mean help these things. Even if they become  
9 strict it will not work, because it is a big  
10 country."

11 How does this align with the ISIS message?

12 A. The ISIS message is, carry out attacks wherever  
13 you are according to the modalities that you see  
14 fit. And in countries, like some European countries  
15 where guns are not easy to obtain, getting a truck  
16 or using a knife might be the best way to do so. In  
17 the United States where guns are fairly easy to  
18 obtain, then, you know, guns are probably the best  
19 way to carry out an attack, and he's explaining that  
20 situation.

21 Q. Can you turn to page 7? It's the same exhibit.  
22 It's the defendant speaking, and starting on line  
23 11 -- or 10:

24 "Does Trump need something like this to reach  
25 the White House? And is there an American reply,

1 how and where? I mean look at this. To begin with,  
2 this operation is in response to what America is  
3 doing. It means that we are not waiting for America  
4 to respond to this operation. What the Islamic  
5 Caliphate State did is in response. I mean it is  
6 well known to what America is doing in the land of  
7 the Muslims. Now the battle has moved, the battle  
8 has moved."

9 What does that mean?

10 A. It's, again, taking a page from ISIS book and  
11 completely identifying what ISIS says. Not only the  
12 fact that the defendant says "we," but the argument  
13 is that all the attacks would take place here in  
14 America in response to the presence of American  
15 troops or the interference that America carries out  
16 in the Middle East. So we, ISIS, are responding to  
17 what America is doing in the Middle East by carrying  
18 out acts of terror here in America.

19 Q. And by saying -- using the word "we," is that  
20 significant?

21 A. It shows that it identifies with ISIS. It's  
22 not a neutral position, Islamic State is doing bad,  
23 America is doing bad, it's that "we" are doing this  
24 against America.

25 Q. Okay. Can you please turn to Government's

1 Exhibit 290; 290, with the corresponding audio of  
2 289. The date on this is June 12th, 2016.

3 Participants are Said Rahim, the defendant, unknown  
4 males 1, 2, 3 and 4.

5 Please turn to page 3, starting on line 24.

6 This is the defendant speaking:

7 "Today or yesterday, the Islamic Caliphate  
8 State executed an operation in the state of Orlando,  
9 Florida, in the United States, and killed 50 or  
10 more. Okay, and this is the thumbprint of the  
11 Islamic State on them, all right then, this is proof  
12 that it is, I mean is taking revenge on America and  
13 that America is its enemy."

14 How do you interpret that?

15 A. Exactly like I said earlier, that the Islamic  
16 State is taking revenge for what America is doing in  
17 the Middle East and that the Islamic State is --  
18 America is the enemy of Islamic State and  
19 vice versa.

20 Q. So if someone belongs to the Islamic State or  
21 purports to belong to the Islamic State, would their  
22 enemy be the same as the Islamic State's enemy?

23 A. Yes, absolutely.

24 Q. So America would be the enemy.

25 A. Absolutely, yes.

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1 Q. Can you please now turn to Government's Exhibit  
2 184; Government's Exhibit 184, the corresponding  
3 audio is 183. Date of this is July 15th, 2016, and  
4 the participant is Said Rahim, the defendant.

5 Can you please turn to page 3? And starting on  
6 line 7: And here he's referencing -- and I'm  
7 summarizing because it's very long -- but the Nice  
8 attack that we were talking about earlier. Here it  
9 says:

10 "We hear some people say terrorism has no  
11 religion. No, terrorism's religion is Islam.  
12 Terrorism's religion is Islam. And the Quran  
13 confirmed it when it said '...to strike terror into  
14 (the hearts of) the enemies, of Allah and your  
15 enemies...' Yes, Terrorism is Muslim, terrorism is  
16 Muslim. It does have a religion; I mean it does  
17 have a religion. Praise be to God and thank you to  
18 the terrorists, thank you O terrorists."

19 Now this is -- would this be a correct  
20 interpretation of Islam broadly?

21 A. I'm not in a position to say correct, I'm not a  
22 theologian. I would say it's very fringe, of  
23 course, vast majority of Muslims would not believe  
24 that is the right way to interpret it. There is the  
25 person, the Quran, that talks about terrorizing the

1 unbelievers. The vast, vast majority of Muslims  
2 would contextualize that verse; there's a historical  
3 reason it's written. You can take a verse from any  
4 kind of text, and read out of context would make it  
5 mean something. This is what ISIS does, takes a  
6 verse that has a historical meaning, the Quran, and  
7 refers to a certain, specific battle that took place  
8 14 centuries ago. But it applies it to today's  
9 Florida, to today's Germany, to today's Syria, which  
10 is taking things out of context. But it is a very  
11 common interpretation among the jihadists. This is  
12 how ISIS justifies its actions. Everything that  
13 ISIS does is justified through verses of the Quran,  
14 of course interpreted in a certain way, which is  
15 very fringe.

16 Q. And would this demonstrate the extremist level  
17 of that interpretation?

18 A. Very much so, yes.

19 Q. Can you please turn to Government's  
20 Exhibit 302; Government's Exhibit 302, with the  
21 corresponding audio of 301, dated July 9th, 2016.  
22 The participant is Said Rahim, the defendant, and  
23 unknown male. And starting on line 7, the defendant  
24 says:

25 "All right. Peace be upon you. May God grant

1 you long live al-Zarqawi."

2 Can you remind us again, Dr. Vidino, who  
3 al-Zarqawi is?

4 A. Zarqawi was the founder of the organization  
5 that then became ISIS.

6 Q. It continues:

7 "May God bless you. Greetings to all.  
8 Hundreds of black Africans were killed by the  
9 American police. A few days ago they killed, I  
10 mean, they killed someone black in front of his  
11 family. I mean, they stopped his car -- his car,  
12 and they got him out of his car, placed him on the  
13 floor, and they shot them. This hatred between the  
14 white and black, that is old, I mean old."

15 And then turning to page 2, starting on line 6,  
16 again, the defendant:

17 "But, God willing, this incident that took  
18 place the day before yesterday in Dallas, I mean  
19 that they were not expecting it, they were not  
20 expecting it to happen in such a way, in such a  
21 tactic and such a...I mean the person who did it was  
22 a sniper, a sniper. He killed five. Man, this had  
23 never happened before, to kill five or six  
24 policemen. So, God willing, it will happen, I mean,  
25 and will increase; matters will increase and will

1 get complicated more and more."

2 How does -- how does this fit inside the ISIS  
3 mission of creating discord?

4 A. Yeah, I mean the incident to which the  
5 defendant is referring has nothing to do with ISIS  
6 per se. I mean, it has to do with dynamics that are  
7 better known to everyone in Dallas.

8 But of course the ISIS narrative exploits any  
9 kind of division and seeks to increase any kind of  
10 polarization within enemy societies, America being  
11 one of the main enemies of ISIS. So the idea of  
12 sowing that discontent, increasing that  
13 polarization, showing that American Society is  
14 inherently flawed, it's a tactic that ISIS uses to  
15 its own advantage.

16 Q. And you have had the opportunity to review the  
17 transcripts in this case?

18 A. Yes, I have.

19 Q. And is there much more than we discussed here  
20 in court contained in these documents?

21 A. Yes; very much so, yes.

22 Q. Is it similar in nature?

23 A. Very much so, yes.

24 Q. In your expert opinion, would the defendant's  
25 actions as an administrator or a moderator in this

1 channel, would that supporter be of use to ISIS?

2 THE COURT: Hold on a second. Do you have  
3 any objection?

4 MR. WHALEN: No.

5 THE COURT: Go ahead.

6 Q. (By Ms. Meeks) Would that supporter be of use  
7 to ISIS?

8 A. Very much so, yes.

9 Q. And why is that?

10 A. Because it would -- having such a structured  
11 large and sophisticated channel allows for many  
12 people to increase their belief in ISIS mindset and  
13 create that community, which allows them to solidify  
14 their commitment to the cause.

15 And then the second part is it allows some of  
16 these individuals to establish contact with people  
17 that would allow them to make the leap from talk to  
18 action, to mobilize as the term that we have used  
19 today.

20 A chat room like this, again because of the  
21 level of the conversation and the access that some  
22 of these people have, it's something that definitely  
23 allows people to mobilize and become part of ISIS,  
24 which is clearly an ISIS interest.

25 MS. MEEKS: Okay. I have no further



1 questions, Your Honor.

2 THE COURT: All right.

3 Mr. Whalen.

4 CROSS-EXAMINATION

5 BY MR. WHALEN:

6 Q. Dr. Vidino, how are you?

7 A. Good.

8 Q. The center that you started at George  
9 Washington, when did that program or that center  
10 begin.

11 A. 2015.

12 Q. 2015?

13 A. Spring of '15, yes.

14 Q. And the center -- how is the center funded?

15 A. We have basically foundations and private  
16 donors that support us. Some are alumni of the  
17 university, private foundations. We don't take  
18 government money, we don't take foreign funding.

19 Q. Okay. Now, would you agree with me that a lot  
20 of the things that we hear in those chats online are  
21 things that have been said before by other people?

22 A. Yes, of course.

23 Q. Okay.

24 A. Very much so.

25 Q. And so would you agree with me that a lot of

1 what is being said is really mimicking what other  
2 people have already said?

3 A. Yes.

4 Q. And would you agree with me that a lot of what  
5 is said, too, is based in the Quran?

6 A. Some of it. I mean a very fringe  
7 interpretation of the Quran.

8 Q. But some of the language is in the Quran. So  
9 the point I'm getting at is that nothing that is  
10 being said is really original; is that fair to say?

11 A. No; it's replicating ISIS propaganda, which  
12 uses mainstream Islamic terms in a fringe way.

13 Q. Now, you've been studying social media,  
14 different platforms of social media; is that  
15 correct?

16 A. Correct.

17 Q. And when was the first time that you heard  
18 about Zello?

19 A. Year and a half ago.

20 Q. Okay. And is it related to this case?

21 A. Correct.

22 Q. Okay. Prior to that, you had not heard of  
23 Zello as a communication or social media platform  
24 for ISIS, correct?

25 A. Correct.

1 Q. And you would agree with me that this group on  
2 Zello, it's not an official group of -- it's not  
3 sanctioned by ISIS. Would you agree with that?

4 A. As far as I know, it's not.

5 Q. Okay. So there's no direct connection between  
6 the group ISIS and this group on Zello, correct?

7 A. As far as I know, no.

8 Q. Okay. And when we talk about -- you've said  
9 this before, and I just want to clarify. These  
10 people in this particular chat room were supporters,  
11 you would call them supporters of ISIS, correct?

12 A. Yes.

13 Q. Okay. So the people coming into it had already  
14 formed an opinion or a belief that they supported  
15 ISIS, correct?

16 A. I can't attest to all of them. I think there  
17 are different degrees to which they supported ISIS.  
18 Some of them had doubts and, in fact, you see that  
19 in some cases the administrators say this is not a  
20 place for doubts. It's clearly people that are  
21 sympathetic, all of them, I think that's the bar.

22 Q. Right. And so what you said is some people  
23 who, if they had doubts, the administrators would  
24 say, "This is not the place for you," correct?

25 A. Correct.

1 Q. So once again, it's people that were  
2 sympathetic who had already formed that belief  
3 independent of the chat room. Would you agree with  
4 that?

5 A. Yes, probably.

6 Q. Okay. And you talked about -- you tried to  
7 indicate that this was more sophisticated because  
8 there was a hierarchy to it. Do you remember saying  
9 that?

10 A. It's one of the reasons why I would say it's  
11 more sophisticated.

12 Q. Okay. But would you agree with me that  
13 different groups can come together and set up their  
14 group however they want to, correct?

15 A. Yeah, of course.

16 Q. Okay. And so just because they decided we're  
17 going to have administrators and moderators and put  
18 some structure to it, in and of itself doesn't mean  
19 it's sophisticated. Would you agree with that?

20 A. It shows there are some -- some rules inside  
21 and a structured hierarchy, and certain people call  
22 the shots and others don't. I think, generally  
23 speaking, when you see most channels, chat rooms on  
24 other platforms, it's more horizontal, more  
25 democratic. So this is a bit different. How

1 functional that was, it's difficult to say, I agree  
2 with you.

3 Q. Just because it's different doesn't necessarily  
4 mean it's necessarily sophisticated.

5 A. It shows a level of structure, which I think is  
6 indicative, together with a couple of elements, with  
7 a level of sophistication.

8 Q. I guess I'm not going to change your mind on  
9 that.

10 A. Sorry.

11 Q. Would you agree with me also, looking at some  
12 of these chats that you discussed, that sometimes  
13 when you look at the transcript, it's just Mr. Rahim  
14 speaking. Do you see those?

15 A. Yes.

16 Q. And as far as you know, you have no idea  
17 whether anybody else was listening; is that fair?

18 A. I don't know. Yeah, that's fair. I don't  
19 know, so yeah.

20 Q. It could be simply just him pontificating,  
21 correct?

22 A. Yes.

23 Q. And also would you agree with me in social  
24 media, that sometimes people use social media to  
25 come across or appear as something they are not.

1 A. Yes, of course.

2 Q. Okay. And it's kind of the phrase I've heard  
3 is, you know, the keyboard warrior. Have you heard  
4 that phrase before?

5 A. I use it often, yes.

6 Q. And the keyboard warrior is somebody who can  
7 sit behind a keyboard and use a device of social  
8 media and say things they normally wouldn't say or  
9 mean in public; is that fair?

10 A. Very normal.

11 Q. Okay. And would you also agree with me that  
12 some people come to groups to then, for lack of a  
13 better word, feel better about themselves. Would  
14 you agree with that?

15 A. Yes.

16 Q. Because with the value of the group, they can  
17 build their own self-esteem, correct?

18 A. Sure.

19 Q. They can come across somebody that's  
20 knowledgeable in order to seek praise because they  
21 are not as confident about themselves as they should  
22 be.

23 A. Yes.

24 Q. Okay. Would you agree with me that the  
25 organization of this channel was kind of an outlier

1 compared to what else you have seen?

2 A. What do you mean exactly?

3 Q. Well, you said before that certain things --  
4 there's kind of some outliers in that, you know, as  
5 far as age goes, if somebody who was older joining  
6 this group would be somewhat of an outlier. Do you  
7 remember testifying to that?

8 A. Yes.

9 Q. Do you agree with me that this channel was  
10 unique and somewhat outside the norm. Would you  
11 agree with me on that?

12 A. From a couple of points of view, yes.

13 Q. And would you agree with me that, as far as you  
14 know, there is no direct connection between anything  
15 that was said in this channel to any specific  
16 terrorist attack? Would you agree with that?

17 A. From an operational point of view, I'm not  
18 aware of a connection.

19 Q. So there's no direct connection that anybody  
20 who participated in a terrorist attack was a member  
21 of this channel, correct?

22 A. As far as I know, yes.

23 Q. And also, as far as you know, there's no direct  
24 connection between anybody who actually traveled to  
25 Syria to join ISIS; is that correct?

1 A. Correct. There are several claims to that in  
2 the conversations, but I have no evidence of that.

3 Q. Okay. And so as you sit here today, you cannot  
4 say, even though there's discussion about  
5 mobilization, whether or not that, in fact, is true;  
6 isn't that correct?

7 A. I don't have evidence, yeah, correct.

8 Q. And you did talk about, as far as age goes  
9 again, about people that may join ISIS. What was  
10 like the median age through your studies that you  
11 determined?

12 A. 24, 25.

13 Q. 24, 25, okay. And are you aware that Mr. Rahim  
14 is 42 years old?

15 A. I am.

16 Q. Okay. Now, the other thing I wanted to talk to  
17 you about is, in some of these, if we talk about --  
18 let me ask it this way: Has there been occasions  
19 where ISIS has taken responsibility for a terrorist  
20 attack that they weren't really involved in?

21 A. Yes.

22 Q. Okay. And is Nice one of those?

23 A. It depends on what you mean by "involved."

24 Q. Okay. Well, let me ask it this way: If  
25 somebody who is a supporter of -- say they are a



1 supporter of ISIS and then commits a terrorist  
2 attack or an attack of some kind, they are not  
3 acting at the direction or control of ISIS, correct?

4 A. Correct.

5 Q. Okay. And so they are not -- ISIS didn't --  
6 the leadership of ISIS didn't plan it, formalize it,  
7 and send this person to commit it, correct?

8 A. Correct.

9 Q. Okay. And so in that situation, ISIS will take  
10 credit for it, but they didn't actually plan it or  
11 commit it, correct?

12 A. Correct. ISIS-inspired we generally call it.  
13 The majority of plots we have seen in the West  
14 follow exactly that module. The individual who  
15 carried out the attack was not operationally  
16 connected to ISIS, it was simply ISIS-inspired.  
17 Some cases might have had contact through social  
18 media, but he's a consumer of ISIS. Propaganda buys  
19 into the message and activates himself  
20 spontaneously. That's statistically the majority of  
21 attacks in the west.

22 Q. Okay.

23 A. ISIS sees them as members, though. That's the  
24 revolution that ISIS brought to terrorism. Somebody  
25 that carries out an action on ISIS behalf,

1 irrespective of any kind of physical contact with  
2 the organization is a member of ISIS.

3 Q. Okay. But ISIS, the leadership, is not  
4 directing or controlling or providing the tools to  
5 commit it, correct?

6 A. Correct.

7 Q. And does Nice fall into that category?

8 A. Purely inspired, yes; as far as what's publicly  
9 known, yes, purely inspired.

10 Q. Does Orlando fall into that?

11 A. Yes.

12 Q. Does Istanbul fall into that?

13 A. Istanbul is slightly different, because if the  
14 perpetrators in Nice and Orlando, as far as I know,  
15 had no connection whatsoever to ISIS other than had  
16 bought into the ideology. The perpetrator of the  
17 Istanbul attack had a long pedigree, long experience  
18 with ISIS and other affiliated groups. It's unclear  
19 whether it was directed by ISIS, but it definitely  
20 had connections to the attack; slightly different.

21 Q. And you've talked about -- maybe you haven't  
22 yet -- is the majority of people who actually went  
23 to fight for ISIS in Syria came through the Turkish  
24 border, correct?

25 A. Vast majority, yes.

1 Q. And if you were to join up with them through  
2 Jordan, that would be an outlier or different,  
3 correct?

4 A. It would be an outlier, yes.

5 Q. Okay.

6 A. It has happened, but . . .

7 Q. But that's not the norm, correct?

8 A. The norm is through Turkey.

9 Q. And in the transcripts that you read, do you  
10 recall reading -- there was a section where one of  
11 the people asked, "how do I get to Turkey? How do I  
12 immigrate to Turkey?"

13 A. Yes.

14 Q. And do you remember Mr. Rahim's response was he  
15 did not know?

16 A. Yes.

17 Q. Okay. You mentioned something else I just  
18 wanted to ask more questions about. You talked  
19 about how sometimes on social media they were being  
20 monitored or the government was listening, something  
21 to that effect. Do you remember that?

22 A. Yes, sir.

23 Q. And it related to if they had a password it  
24 would be a private channel?

25 A. (No audible answer.)

1 Q. Then if they then went to a private channel,  
2 they thought it wasn't going to be --

3 A. Encryption, not a password, it's about  
4 encrypted. Certain platforms have a higher level of  
5 encryption. They're more secure than others. So  
6 generally when the conversation becomes more  
7 operational and sensitive, there's a tendency to  
8 move to platforms where the level of encryption is  
9 higher, where there's the belief it's more difficult  
10 for law enforcement to monitor the conversation.

11 Q. I'm just trying to, the way you said it is,  
12 there's a belief that it's more secure, but is that  
13 really true?

14 A. Sometimes yes, sometimes no.

15 Q. Okay. Just so I'm clear, what all did you look  
16 at to prepare for your testimony today? What were  
17 you provided to review?

18 A. I was provided a large amount of the  
19 conversations, I do believe all of them, the  
20 conversations from the platform, from the channel.

21 Q. And were you aware that those -- that the  
22 origin of those conversations came from a website  
23 where there were just maybe potentially snippets of  
24 a larger conversation?

25 A. Yes.

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1 Q. Okay. Would you agree with me that, in order  
2 to determine what's being said or the meaning of  
3 things, context does matter?

4 A. Of course.

5 Q. And listening to an entire conversation gives  
6 you more context than just a portion of it.

7 A. Of course.

8 MR. WHALEN: I will pass the witness.

9 THE COURT: Redirect.

10 MS. MEEKS: Thank you, Your Honor.

11 **REDIRECT EXAMINATION**

12 **BY MS. MEEKS:**

13 Q. Dr. Vidino, the defense asked about other users  
14 being on the channel. Can you tell from the context  
15 of the defendant's statements whether he was talking  
16 to someone?

17 A. He was, most of the time, yes, absolutely. And  
18 of course even the long sermons was obviously  
19 intended for an audience.

20 Q. And the people that there were certain -- that  
21 we had read, and certainly there are other questions  
22 from other users in those transcripts, what does  
23 that show you with the questions that were asked of  
24 the defendant?

25 A. The interaction was very frequent. There was

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1 an expectation that the Q and A would go on, and the  
2 relationship was that people looked up to the  
3 defendant. As I said, it wasn't a two-way street,  
4 it was always people asking him questions. I don't  
5 think I've seen a single occasion where it is the  
6 defendant who asks questions to somebody else.

7 Q. And he was often called sheikh?

8 A. Yes.

9 Q. What would that mean to you? How would you get  
10 that title, "sheikh"?

11 A. It is a title who is given to somebody who is  
12 particularly knowledgeable and wise. It's -- again,  
13 it entails a relationship of subordination. You  
14 refer to sheikh as somebody who is above you and  
15 whose wisdom you rely upon.

16 Q. So someone you would presumably have listened  
17 to.

18 A. Absolutely.

19 Q. And you had talked a little bit about the  
20 encrypted applications. Do you typically see that  
21 when conversations go operational -- and please  
22 describe what you mean by operational -- that they  
23 go to those other platforms?

24 A. Yes, that it is what normally happens when --  
25 these platforms, these channels, serve a variety of

1 purposes. There are always initial conversations  
2 where people share propaganda, share thoughts, share  
3 views. And then, of course, at times the  
4 conversation, particularly when two or more  
5 individuals trust one another, they want to talk  
6 about something more operational. By operational I  
7 mean mobilizing; I mean finding ways to travel to  
8 join ISIS; finding ways to carry out the attacks;  
9 things that are more sensitive and the people who  
10 are active on these platforms know will be  
11 incriminating and attract even further attention  
12 from law enforcement. So what happens is, these  
13 individuals move the conversations to other  
14 platforms that they believe to be more difficult for  
15 law enforcement to monitor.

16 Now, of course, there are some individuals who  
17 are extremely savvy in how they move from one  
18 platform to the other, and others are not as clever,  
19 as slick, but that's generally the modus operandi.

20 Q. So when there is a reference to moving to the  
21 private, is that what you believe that to indicate?

22 A. Yes, that's exactly what it means.

23 Q. The people that are in the room, the defense  
24 had mentioned that they were like-minded, and you  
25 had talked about spectrum of folks who would be

1 listening.

2 Do you see any of them as susceptible to  
3 influence or seeking information based on what you  
4 had seen?

5 A. There are quite a few that are asking  
6 questions. Again, very, very clearly already ISIS  
7 sympathizer, they are not really in doubt. But, of  
8 course, like anything, one can be a supporter of  
9 something to some degree, or one can be a diehard  
10 supporter of something.

11 Clearly, these individuals who are less  
12 enthusiastic are asking questions. They are more in  
13 the beginning of a radicalization trajectory and  
14 they ask questions, and the defendant is the one --  
15 him and a few others providing the answers.

16 Q. So when you've seen recruitment efforts in your  
17 studies and your experience, does recruitment  
18 involve motivating?

19 A. Yeah, absolutely. That's a big component.  
20 It's coaching, it's handholding, it's motivating in  
21 different ways, because, of course, no two people  
22 are alike. So somebody would be more triggered by  
23 something, by a more softer approach. Somebody else  
24 might be more motivated by almost egging him on.  
25 Psychology is a big part of it, but that's how



1 recruitment works. It's to some degree -- I mean a  
2 lot of studies find the similarities with grooming  
3 online with pedophiles or other dynamics. You try  
4 to create the bond. You try to find what is the key  
5 to motivate the person, and you try to push that  
6 person in a certain direction. That's basically how  
7 these platforms work.

8 Q. So would you consider a recruiter different  
9 than a keyboard warrior?

10 A. In the sense that what he is trying to achieve  
11 is then move the target of his recruitment effort  
12 into doing something in the physical world, moving  
13 him to mobilize, moving him to travel, to carry out  
14 attacks. The online space is always linked to the  
15 offline space. One goes -- what happens online is  
16 basically done to achieve something in the offline.

17 Q. Okay. One of the things that was mentioned is  
18 this channel is unique, outside the norm. In what  
19 ways?

20 A. I would say in the size of the individuals  
21 involved in it.

22 Q. Do you mean the membership size?

23 A. Yeah. If I compare it to other channels,  
24 generally it's in the few-hundred individuals that  
25 are part of it; here, the size seems to be much

1 bigger. And then in -- yeah, the level of  
2 sophistication, and I mean by that, both have sort  
3 of a formalized structure in it. It's not the only  
4 case I have seen, but, generally speaking, you don't  
5 see it.

6 And in the level of knowledge that the  
7 defendant and a few other people have, they know  
8 what they are talking about. Sometimes, in  
9 particular in a U.S. setting, a lot of ISIS  
10 sympathizers really have very limited knowledge of  
11 ISIS, even of Islam in many cases. And I think in  
12 this case it's quite different, there's a fairly  
13 deep knowledge of all these dynamics.

14 Q. And one of the things you were asked from the  
15 defense also is that traveling from Turkey into  
16 Syria was most common, but people do travel from  
17 other locations; is that right?

18 A. Yes. There's been people that have traveled  
19 from Lebanon, from Jordan, and a smaller number from  
20 the Kurdish areas of Iraq.

21 Q. Why would a person choose to travel from Jordan  
22 or Lebanon or those other areas?

23 A. Most of those that travel from Jordan or  
24 Lebanon are Jordanian or Lebanese. So if you are in  
25 Jordan, which is a country that borders with Syria,

1 it makes more sense. You know the smuggling routes.  
2 Even the Jordanian government has patrolled the  
3 border between Jordan and Syria in a much better way  
4 to know than the Turks have done for their on  
5 border, any border can be crossed at the end of the  
6 day. So particular individuals who are local, from  
7 Jordan, have found ways to cross the border. In  
8 fact, Jordanian government estimates about 3,000  
9 Jordanians have crossed the border and joined ISIS  
10 from Jordan.

11 Q. So if a person was more familiar with Jordan  
12 than Turkey, that might be a more logical choice.

13 A. It might be, yeah.

14 Q. And in your expert opinion, was the defendant,  
15 in his statements and his actions, attempting to  
16 recruit and radicalize for ISIS?

17 MR. WHALEN: Objection, Your Honor.

18 THE COURT: Okay. Why?

19 MR. WHALEN: I think it goes to the  
20 ultimate issue, Your Honor.

21 THE COURT: And your response?

22 MS. MEEKS: The response would be, it's  
23 not the defendant's intent that is being elicited  
24 here, it's one of the actions that were consistent  
25 with that of recruitment.

1 THE COURT: Okay. Overruled.

2 Q. (By Ms. Meeks) In your expert opinion, were  
3 the actions and statements made by the defendant  
4 consistent with recruitment efforts for recruitment  
5 and radicalization for ISIS?

6 A. Yes, very much so.

7 MS. MEEKS: Okay. Thank you.

8 THE COURT: Mr. Whalen.

9 **RECROSS-EXAMINATION**

10 **BY MR. WHALEN:**

11 Q. We talked about, you know, they all come in,  
12 they are all already -- they already have some  
13 sympathy, correct?

14 A. Okay.

15 Q. And you mentioned it's kind of like the avid  
16 fan versus the casual fan?

17 A. Sort of, yes.

18 Q. Is that kind of how you described it?

19 A. Yeah.

20 Q. Here's the way I understand that: I love Penn  
21 State football because I went to Penn State, so I  
22 love Penn State football. But there's also Penn  
23 State football fans that can tell you the depth  
24 chart, where we're weak, what plays are run, right?  
25 Because they study it. But it doesn't change the

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1 fact that we are both equally fans. Would you agree  
2 with that?

3 A. Yeah, sort of.

4 Q. And the information that you talk about that he  
5 says he has a lot of knowledge about, that  
6 information is all readily available on the  
7 Internet, in the Quran, and in multiple sources.  
8 Would you agree with that?

9 A. Not in the Quran, specifically; in ISIS  
10 propaganda, yes.

11 Q. You can find it.

12 A. You can find it in other places, yes, of  
13 course; yes.

14 Q. And obviously, your organization puts papers  
15 out that people can read and study those and  
16 understand the dynamics of what goes on in the  
17 world, correct?

18 A. Sure, yes.

19 Q. And if you have the interest, you can find it.  
20 Would you agree with that?

21 A. Yes, of course.

22 Q. Now, getting to this other question about a  
23 keyboard warrior could say -- could type the same  
24 thing, just like somebody who may have the intent to  
25 say the same -- to recruit people, the words on the

1 paper are going to be the same, correct?

2 A. Correct.

3 Q. Okay. But you can't determine what's in a  
4 person's head, can you?

5 A. No, of course not.

6 MR. WHALEN: All right. I will pass the  
7 witness.

8 THE COURT: Anything else?

9 MS. MEEKS: No further questions, Your  
10 Honor.

11 THE COURT: You may step down.

12 May this witness be excused?

13 MS. MEEKS: Yes, Your Honor.

14 MR. WHALEN: Yes, Your Honor.

15 THE COURT: Dr. Vidino, please remember  
16 not to talk about the case until it's over. Okay?

17 Thank you very much.

18 (End of requested record.)

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**SHAWNIE ARCHULETA, CSR/CRR**  
**FEDERAL COURT REPORTER - 214.753.2747**

## C E R T I F I C A T E

I, Shawnie Archuleta, CCR/CRR, certify  
that the foregoing is a transcript from the record  
of the proceedings in the foregoing entitled matter.

I further certify that the transcript fees  
format comply with those prescribed by the Court and  
the Judicial Conference of the United States.

This 5th day of December 2019.

s/Shawnie Archuleta  
Shawnie Archuleta CCR No. 7533  
Official Court Reporter  
The Northern District of Texas  
Dallas Division

My CSR license expires: December 31, 2019

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**SHAWNIE ARCHULETA, CSR/CRR**  
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